



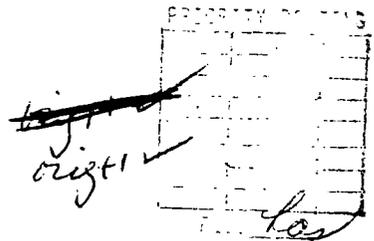
Commonwealth Edison

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Address Reply to: Post Office Box 767

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March 15, 1988



Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Nuclear Power Station Units 2 and 3
Supplemental Response to Allegations
NRC Docket Nos. 50-237 and 50-249

References (a): November 13, 1987 letter from J.A. Hind
to Cordell Reed

(b): December 29, 1987 letter from J.A. Silady
to A.B. Davis

Dear Mr. Davis:

Reference (a) notified Commonwealth Edison Company of three allegations received by Region III in the areas of Radiation Protection and Fitness for Duty at Dresden Station. The results of the related CECO investigations were provided in Reference (b).

Subsequently your staff has requested that CECO provide additional details on the scope of these investigations. The Attachment to this letter expands on the previous response and more thoroughly documents the bases for our conclusions. The Attachment can therefore be used to either supplement or replace, in its entirety, the previous response of Reference (b).

Please contact this office should further information be required.

Very truly yours,

J. A. Silady

Nuclear Licensing Administrator

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Attachment

cc: NRC Resident Inspector - Dresden
M. Grotenhuis - NRR

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ATTACHMENT

1. An investigation into the first allegation has been performed. This investigation included assessing the allegation, developing program changes where applicable and reviewing the issue on a company wide basis.

This investigation has not revealed any solid evidence that contaminated personal clothing articles were removed from site. This conclusion was based upon the following. A comprehensive survey of Dresden's most frequently used tool caddies was performed. No contamination was detected. If these containers were in fact used to transport contaminated materials, it is possible that some contamination would be found. A comprehensive survey of the personnel lockers was also performed. In no case was contamination detected. Dresden considered surveying tool caddies off-site, but has determined that this is not needed because of the tool caddy and locker survey results which indicates that there is a very small probability of actually finding contaminated goods at the four facilities which provide the mobile maintenance force.

Annual retraining, weekly tailgates, and daily updates are used to emphasize the importance of contamination control to each employee. Each employee is familiar with the hazards of radiation and are aware of the company's policies and program regarding contamination control.

In order to improve control of tool caddies leaving site and prevent removal of contaminated material, the following process is now being used. The radiation protection survey for unconditional release of tool caddies is being performed in the warehouse. Upon clearance by Radiation Protection, the tool caddies are immediately moved into the unprotected area (outside Security) of the warehouse. This sequence will eliminate any access to the tool caddies by unauthorized personnel. This process was formalized in February 1988. Additionally, the need to destroy/deface contaminated personal clothing prior to disposal as radioactive waste will be included in a procedure for processing of contaminated personal items. This action will eliminate any value of the clothing and therefore eliminate the only motivation for an individual to attempt to circumvent the rules to remove the items from the site. This process was also formalized during February 1988.

This allegation was reviewed with respect to its applicability to other CECo nuclear stations. The specific issue of the release of radioactive material via the mobile maintenance tool caddies does not apply at other CECo facilities. Dresden is the only nuclear site that utilizes the mobile maintenance work force. Technical Services Health Physics has issued a letter to the stations regarding this allegation and each station has been requested to review and modify their programs to reduce the possibility of similar types of problems.

2. In response to the second allegation, Dresden has reviewed its contamination monitoring program and equipment.

Commonwealth Edison has a comprehensive monitoring program for personnel which consist of three phases. Any individual that has entered a contaminated area is required to whole body frisk before donning his outer clothing. The program specifies that the frisk is performed with a shielded pancake GM probe that is capable of detecting 5000 dpm/100 cm². The survey is performed prior to donning the outer clothes to assure maximum detection sensitivity. If an individual does detect contamination, he then contacts Radiation Protection, and is advised to cover the contaminated area. This prevents the spread of the contaminate while the individual is in transit to the decontamination room.

If contamination is not detected while frisking, the individual will then dress and pass through a whole body contamination monitor. All personnel exiting the radiologically controlled area at the major access points are required to pass through this type of monitor. These monitors are beta sensitive and are set to alarm at approximately 17,000 dpm/detector face. This equates to 3400 dpm/100 cm². This monitor consists of 15 separate detectors and detects localized as well as low level contamination that may be distributed over the entire body. This monitor is extremely sensitive but because of its design a small percentage of dead space does exist. There is a small possibility that an individual could pass through these monitors with a small amount of activity undetected, but this is very unlikely. The allegor stated that he passed through the monitor after covering the activity with his coat. The detectors do lose some sensitivity when the activity is shielded. The amount that the allegor stated in the allegation is detectable through a cowhide jacket. This was verified through a simulation of the event. An 11,000 cpm source was positioned on a worker's shoulder. The source was shielded by a cowhide jacket and did alarm the PCM.

Lastly, all personnel exit the protected area pass through a radiation portal monitor. This monitor is gamma sensitive and thus activity cannot be shielded by clothing. Additionally, these sensitive monitors can detect point sources as dispersed contamination. This three-phase process utilizes state-of-the-art equipment and is set to detect contamination at extremely low levels. Our procedures and policies concerning detection of personnel contamination are taught in retraining and are publicized frequently to all station and contracting personnel through the weekly department communication meeting.

This procedure for the monitoring of personnel for contamination is standardized throughout Commonwealth Edison. Equivalent equipment set at similar sensitivities is used at the other facilities. Notice of this allegation will be sent to each site for review and possible applicability.

Finally, a review of ROR's and personal contamination events indicated occasions where personnel have not conducted proper surveys when exiting a radiologically controlled area. However, willful intent to circumvent the requirements has not been a causal factor in these events. As part of the investigation of these events, a review is made to determine if disciplinary action is necessary. Also, to communicate the seriousness of such actions, a discussion of the events will be held during the weekly department meetings in March 1988.

3. In response to the third allegation the following actions have been taken. The four Mechanical Maintenance personnel named in the allegation have been interviewed by the Assistant Superintendent of Maintenance and/or the Master Mechanic. Although all have admitted to occasions where alcohol was consumed during lunch periods (off-site), none of them felt that "excessive amounts" were consumed. The company position on alcohol consumption and fitness for duty was stressed to each employee. All were encouraged to eliminate the practice of alcohol consumption at lunch and were further encouraged to avoid going off-site for lunch.

The Master Mechanic has also reviewed the performance of the four Maintenance personnel with their respective supervisors and found no indication of any problems with respect to fitness for duty and quality of work. Additionally, a review of personnel files for each individual shows no record of a concern for fitness for duty, or an absenteeism/safety record that would suggest one. As a result of the reviews on the individuals named, no administrative or disciplinary action was taken.

This allegation was discussed with all maintenance department heads (i.e., for Electrical and Instrument Maintenance) as well as the Stationman management and they, in turn, reviewed their departments for any evidence of fitness for duty problems. No indications of this type of problem were found in other departments.

The station's commitment to ensuring employees report to work fit for duty is a strong one. A letter which included the Company Policy Regarding Drug and Alcohol Abuse and a station policy statement have been issued to all station employees to reinforce this commitment. The Company Policy includes the following statement with respect to alcohol abuse:

"Employees who are under the influence of alcohol, or who possess or consume alcohol on the job, have the potential for interfering with their own, as well as their co-workers', safe and efficient job performance. Consistent with existing Company practices, such conditions will be proper cause for administrative action up to and including termination of employment."

All management personnel are trained to recognize aberrant behavior that may impact an employee's ability to perform their work. The fitness for-duty program, entitled "Readiness: Management's Role", educates the participants of the health effects of alcohol and drugs as well as the resources available to a management employee who may encounter an employee who appears unfit for duty.

Additionally, all contractor security personnel receive training to recognize aberrant behavior. They, along with other contractor management on-site, have also been invited and participated in the company's fitness for duty program.