



Commonwealth Edison
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HQ

September 14, 1988

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

Subject: Dresden Station Units 2 and 3
Response to Notice of Violation
Concerning Emergency Operating
Procedures
NRC Docket Nos. 50-237 and 50-249

Reference (a): G.C. Wright letter to Cordell Reed dated
August 18, 1988 transmitting Notice of
Violation 237/88012; 249/88014 Concerning
Lack of QA Audit for the EOP's

Dear Mr. Davis:

Enclosed is the Commonwealth Edison Company (CECo) response to the
Reference (a) Notice of Violation (NOV) which resulted from an NRC team
inspection of the Dresden Emergency Operating Procedures conducted from May 31
through June 8, 1988.

We understand the significance of the issues identified and have
implemented corrective actions to prevent recurrence. In addition to the
violation response, Reference (a) also requested that CECO document the short
and long term actions, which were discussed at the station exit meeting, to
address other findings and observations of the inspection team. These actions
are being documented in a separate transmittal.

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Q PDC

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A.B. Davis

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September 14, 1988

If there are any further questions regarding this response, please contact this office.

Very truly yours,



Henry E. Bliss
Nuclear Licensing Manager

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Attachment

cc: B.L. Siegel - Project Manager, NRR
S.G. DuPont - Senior Resident Inspector, Dresden

5103K

ATTACHMENT

COMMONWEALTH EDISON COMPANY

REPLY TO NOTICE OF VIOLATION

VIOLATION

Contrary to 10 CFR 50, Appendix B, Criterion XVIII, the licensee failed to perform planned and periodic audits of the Dresden Emergency Operating Procedures between October 31, 1985 and June 8, 1988. This is evidenced by the fact that, during the course of the inspection, the licensee could not show any evidence that an audit had ever been performed on the Dresden Emergency Operating Procedures.

CORRECTIVE ACTIONS TAKEN

The failure to audit the Emergency Operating Procedures (EOP's) was an oversight. Quality Assurance missed the recommendation in NUREG-0899 for QA overview of the EOP program, and had independently concluded that the involvement of the NRC licensed SRO's within QA in the implementation, training, and simulator use of the EOP's offered adequate coverage.

In addition, a Quality Assurance Standard Surveillance checklist incorporating the attributes of NUREG/CR 2005 was added to the QA Surveillance program in May, 1988 for performance in 1988, but had not been performed at Dresden at the time of the inspection.

Quality Assurance issued a letter June 14, 1988 requiring an audit to be performed at Dresden of the Emergency Operating Procedures (EOP). The Dresden 1988 Audit Schedule was revised on July 1, 1988 to incorporate the EOP audit. The audit will be completed by December 31, 1988.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATION

The Commonwealth Edison Nuclear Stations, including Dresden, Quad Cities, Zion, LaSalle, Byron, and Braidwood, have had their respective station audit schedules revised to include the EOP audits which have been completed, are underway, or will be performed by December 31, 1988.

A reference to the EOPs was also added to the Quality Assurance Off-Site Audit Plan for each of the Commonwealth Edison Stations to ensure future coverage.

In addition, the 1989 station audit schedule for each of the six stations is also in the preparation phase and includes the applicable elements of the EOP program. The respective audits will be completed during 1989.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by December 31, 1988.