



**Commonwealth Edison**  
72 West Adams Street, Chicago, Illinois  
Address Reply to: Post Office Box 767  
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June 2, 1989

Mr. James Lieberman, Director  
Office of Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Dresden Nuclear Power Station Unit 3  
Response to Order Imposing a Civil  
Monetary Penalty - Enforcement  
Action 87-81  
NRC Docket No. 50-249

- References (a): A.B. Davis letter to J.J. O'Connor dated  
April 29, 1988
- (b): L.O. DelGeorge letter to J. Lieberman  
dated June 28, 1988
- (c): H.L. Thompson, Jr. letter to J.J. O'Connor  
dated May 3, 1989.

Mr. Lieberman:

Reference (a) transmitted the Notice of Violation and proposed Imposition of Civil Penalty involving a failure to provide documentation of adequate testing and/or analysis, as specified in 10 CFR 50.49, to support the environmental qualification of AMP nylon-insulated butt splices which were used in a number of important to safety applications. A civil penalty of one hundred fifty thousand dollars (\$150,000) was proposed for the violation.

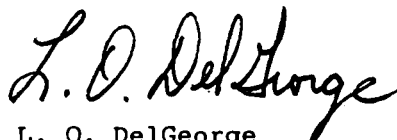
In Reference (b), Commonwealth Edison admitted that we were unable to demonstrate that the AMP splices were environmentally qualified based on the test results conducted at CECO's initiative in December, 1986. At that time we documented the bases for our belief that the documentation on file was adequate to demonstrate that the AMP splices were properly qualified in accordance with DOR guidelines by type testing and analysis. Commonwealth Edison requested reconsideration of the civil penalty on this and other bases discussed in Reference (b).

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Reference (c) denied the request for reconsideration and imposed the civil penalty. While Commonwealth Edison believes that the facts surrounding the violation do not warrant the amount of the civil penalty, we nonetheless have elected not to request a hearing on this matter. Accordingly, enclosed please find a check for \$150,000 in payment of the fine.

Very truly yours,



L. O. DelGeorge  
Assistant Vice President

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Enclosure

cc: A.B. Davis - Regional Administrator, RIII  
B.L. Siegel - Project Manager, NRR  
Dresden Senior Resident Inspector