



Commonwealth Edison
Projects and Construction Services
1400 Opus Place, Suite 500
Downers Grove, Illinois 60515

January 15, 1990

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
Response to Notice of Violation and Inspection
Report Nos. 50-237/89025 and 50-249/89025
NRC Docket Nos. 50-237 and 50-249

Reference: Letter from L.R. Greger to Cordell Reed dated
December 18, 1989, transmitting subject
Inspection Report and Notice of Violation.

Mr. Davis:

Enclosed is the Commonwealth Edison Company (CECo) response to the
subject Notice of Violation (NOV) and Inspection Report (IR) which evaluated
Dresden's radwaste management program.

CECo understands the significance of the issue involved. Corrective
actions have been taken or have been initiated to prevent further items of
noncompliance in these areas.

Please contact this office should further information be required.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

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Attachment

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

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

SEVERITY LEVEL IV

VIOLATION

Technical Specification 4.2.G requires that the reactor building vent and main chimney SPING low range noble gas monitors be calibrated in accordance with Table 4.2.3.

Table 4.2.3 requires that the reactor building vent and main chimney SPING low range noble gas monitors be calibrated once per refueling outage with intervals of not more than once every 18 months.

Contrary to the above, testing performed on the reactor building vent SPING during April 1989, and on the main chimney SPING during February 1989, did not constitute an adequate calibration of the SPING's low range noble gas monitors in that insufficient noble gaseous activity was present in the effluent to perform the calibrations. The previous calibrations performed during the fourth calendar quarter of 1987, were adequate.

This is a Severity Level IV violation (Supplement IV).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A calibration gas source traceable to the National Institute of Standards and Technology (NIST) has been ordered. Once the calibration source is received, the System Particulate, Iodine and Noble Gas (SPING) monitors will be properly calibrated.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCES

1. Dresden Radiation Protection Procedure (DRP) 2000-3, "SPING-4 Effluent Monitor Calibration," will be revised by June, 1990 to require the use of a calibration gas source to be of a specified activity and to be NIST traceable.
2. DRP 2000-6, "SPING-4 Effluent Monitor Quarterly Function Test," will be revised by June, 1990 to require the use of a calibration source to be of a specified activity.

3. DRP 2000-7, "Liquid Discharge Monitor Calibration," will be revised by June, 1990 to require the use of a calibration source to be of a specified activity and to be NIST traceable.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Receipt of the calibration gas source is expected by March, 1990. At that time, the SPINGs will be properly calibrated. All actions to achieve full compliance and prevent further non-compliance will be complete by June, 1990.

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