



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

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June 11, 1990

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

Subject: Dresden Nuclear Power Station
Response to Radiation Protection Concern
Inspection Report 50-237/90012; 50-249/90011
NRC Docket Nos. 50-237 and 249

Reference: L.R. Gregor letter to Cordell Reed dated
April 27, 1990 transmitting NRC Inspection
Report 50-237/90012; 50-249/90011.

Mr. Davis:

The following actions are being taken by Dresden to address the concern mentioned in the referenced NRC Inspection Report with regards to the need to improve job planning to limit administrative overexposure. The referenced letter requested that a response concerning this weakness be provided within 60 days (i.e. by June 27, 1990).

- A. The Radiation Protection Department will develop "Guidelines for Work in High Dose Rate Gradients or Localized Hot Spot Areas." This guidance will be designed specifically for the worker and will include information such as the electronic dosimeter alarms, warnings to notify Radiation Protection before relocating any lead shielding, and remphasizing the necessity for workers to notify Radiation Protection prior to changing work position or area. This will be completed by the end of June 1990.
- B. Dresden Administrative Procedure DAP 12-9, "ALARA Action Reviews," will be revised to include recommendations for work in areas that have large dose rate gradients or localized hot spots. These recommendations will include the requirement for the Radiation Protection Technician to attend pre-job briefings, the use of small diameter detectors for better dose rate assessment, the necessity to conduct comprehensive dose rate surveys, and the dissemination of "Guidelines for Work in High Dose Rate Gradients or Localized Hot Spot Areas" to each worker on that job. Additionally, the pre-job briefing form will be modified to include a signature sheet to record worker's attendance. DAP 12-9 will be revised by August 1990.

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- C. All Radiation Protection Technicians and Supervisors will attend a training class that will address recent Radiation Occurrence Reports (ROR's) on the specific jobs that have involved administrative overexposures. Topics that will be covered include attendance at pre-job briefings, clear and concise communications with individual workers, performance of comprehensive surveys using a small diameter detector where appropriate, and the criteria for Radiation Protection stopping work. This training session will be completed by August 1990.

Commonwealth Edison believes that these actions will minimize instances of individuals exceeding company prescribed administrative limits for radiation exposure. Please contact this office should further information be required.

Very truly yours



T.J. Kovach
Nuclear Licensing Manager

cc: P.L. Eng - Project Manager, NRR
S.G. DuPont - Sr. Resident Inspector, Dresden
J.M. Hinds - Projects Section Chief, RIII
M.C. Schumacher - RCCS Section Chief, RIII

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