Docket No. 50-237 Docket No. 50-249

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Licensing Department-Suite 300
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Gentlemen:

This refers to the routine safety inspection conducted by Mr. J. A. Gavula of this office on August 21-22, 27-28, September 17-21, and October 11, 1990, of activities at the Dresden Station, Units 2 and 3, authorized by NRC Operating Licenses No. DPR-19 and No. DPR-25 and to the discussion of our findings with Mr. M. Richter at the conclusion of the inspection.

The purpose of this inspection was to determine whether activities and programs associated with inservice inspection (ISI) component support examinations were performed in accordance with regulatory requirements and licensed commitments. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice. A written response is required. In addition, we request that in your response you address the generic issue of historical operability evaluations as discussed in Paragraph 2.d. of this inspection report. The current corporate engineering philosophy, which apparently applies to all six CECo nuclear sites, should be discussed with regard to the exclusion of design basis load cases in these operability analyses.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed by Mark A. Ring

M. A. Ring, Chief Engineering Branch

Enclosures:

1. Notice of Violation

2. Inspection Reports
No. 50-237/90021(DRS);
No. 50-249/90021(DRS)

cc w/enclosures:

D. Galle, Vice President - BWR
Operations
T. Kovach, Nuclear
Licensing Manager
E. D. Eenigenburg, Station Manager
DCD/DCB (RIDS)
OC/LFDCB
Resident Inspectors LaSalle,
Dresden, Quad Cities
Richard Hubbard
J. W. McCaffrey, Chief, Public

Utilities Division Robert Newmann, Office of Public Counsel, State of Illinois Center

RIII #Gavula/jk 10/18/90 RIII Hinds 10/13/90 RIII DANIE Danielson 10//8/90

RIII Ring 10/16/90