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January 18, 1991

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

Subject: Dresden Nuclear Power Station Units 2 and 3
 Response to Notice of Violation
 Inspection 50-237/90026; 50-249/90025
NRC Docket No. 50-237 and 50-249

Reference: L. Robert Greger letter to Cordell Reed dated
 December 20, 1990.

Mr. Davis:

The referenced letter transmitted Inspection Report Nos. 50-237/90026 and 50-249/90025 for Dresden Station. The Inspection Report contained one (1) Notice of Violation regarding failure to comply with Technical Specification 6.2.B which requires that radiation control procedures be maintained, made available to all station personnel, and adhered to. Commonwealth Edison (CECo) has reviewed the Notice of Violation and agrees that the violation occurred as described. The violation cited three examples, two of which had been corrected and do not require a response. Our response to the remaining example that cited failure of the workers to follow the requirements of the Radiation Work Permit program is attached. This example is similar to weaknesses identified in February, 1990. We have reviewed corrective actions to the February, 1990 concern and concluded that their focus was on improving and expanding Radiation Protection Technicians' responsibilities. The corrective actions identified for this most recent occurrence address the responsibilities of all radiation workers.

If you or your staff has any questions please refer them to Rita Radtke, Compliance Engineer at 708/515-7284.

Very truly yours,

T. J. Kovach
 Nuclear Licensing Manager

cc: B.L. Siegel, Project Manager, NRR
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NOTICE OF VIOLATION

Commonwealth Edison Company
Dresden Nuclear Station

Docket Nos. 50-237; 50-249
Licenses No. DPR-19; DPR-25

During an NRC inspection conducted on November 5-23, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1990) the violation is listed below:

Technical Specification 6.2.B. requires that radiation control procedures be maintained, made available to all station personnel, and adhered to. Procedure DAP 12-25, Revision 0, "Radiation Work Permit Program," states that each worker performing a job under a Radiation Work Permit (RWP) must follow the requirements of the RWP and all associated documents.

Contrary to the above, on September 27, 1990, two workers performing a job under RWP 321A did not follow a requirement of the RWP to notify radiation protection personnel at the Unit 2 drywell prior to beginning work. The workers subsequently worked, without authorization from radiation protection personnel, near a pipe with contact exposure rates ranging from 0.8 to 2 rem per hour.

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

DISCUSSION

The inspection report discusses similarities between the administrative overexposure which occurred on September 27, 1990 and an event which occurred on February 2, 1990. Although dose rate gradients contributed to the overexposures in both events, the causes for the overexposures were different. In the February 2 event, there were inadequate communications between the contractor personnel and the Radiation Protection (RP) department which resulted in inadequately controlled work activities at the job site. Corrective actions from that event were oriented toward performance in the RP area relative to pre-job dose rate surveys, time-keeping accuracy, and pre-job briefings.

The September 27 event was caused by two factors:

1. Inadequate communications between Contractor Supervision and Contractor Craft Personnel led to the Contractor Craftsmen working in an area with dose rate conditions significantly different than those assessed by the RP department.
2. The Contractor Craftsmen failed to contact the RP Technician (RPT) at the drywell (as was required by the RWP). Had the contact occurred, we believe the RPT would have prevented the Craftsmen from working in an area for which they had inadequate dosimetry placement.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. The two Craftsmen were prohibited from work in radiation areas until their doses could accurately be determined. The fourth floor of the drywell was resurveyed and the Craftsmen's activities were reviewed. Accurate dose determinations were made and found to be 246 and 113 mrem for each individual, respectively.

2. Additional radiation warning signs were established on the fourth floor of the drywell.
3. RP Technicians assigned to the drywell were instructed to limit drywell access to those people who have informed the RP department of their work location and job task. A log was created to assist the RPTs in tracking this information.
4. This event was reviewed with all contractor superintendents and/or shift supervisors on September 28, 1990. This event was also discussed with all contractor personnel at the October 25, 1990 tailgate. Pre-job briefings, meaning of signs, reading of dosimeters, and checking with RP prior to drywell entry were emphasized.
5. This event was reviewed in Station tailgate meetings with all personnel to emphasize checking with RP, the importance of the RPT understanding job location and activities, and the importance of working only in the areas authorized by the RWP.
6. This event was included in a series of management meetings between the Station Manager and all supervisors (Dresden, non-Dresden CECO, and contractor) held on October 17, 1990. Supervisors then met with individuals they supervised to further discuss these events on October 18, 1990.
7. A letter was issued by the Station Manager to all badged personnel (CECO and non-CECO) on the requirement to adhere to all radiation protection practices and procedures.

CORRECTIVE ACTIONS TO PREVENT FURTHER NONCOMPLIANCES

1. The Radiation Work Permit (RWP) package will be reorganized to reduce or eliminate information overload to individual radiation workers and enhance the workers ability to review radiological conditions. The first section will be for individual radiation workers and will contain the RWP, radiation dose rate and smearable contamination maps, and other information which the individual radiation worker must have. The reading of this section will be required. Other information related to ALARA and job planning will be kept in a separate section. This reorganization will allow information which is important to the individual radiation worker to be readily available. This will be completed by March 31, 1991 (237-100-9002601A-01).
2. DAP 12-04, "Control of High and High High Radiation Areas," will be revised to improve RP department control for access to the drywell by March 31, 1991 (237-100-9002601A-02).
3. The passing grade for Nuclear-General Employee Training (NGET) has been raised to 80% from the previous 70%. This will allow for better screening of acceptably qualified contractor supplied craftsmen.

4. The Station's current administrative procedure training program given to contractor supplied craftsmen will be expanded to include a module on recent radiologically significant events. This module will address the event cited in this violation along with other issues such as high radiation area door control and general procedure compliance by March 31, 1991 (237-100-9002601A-03).
5. CECO is expanding their NGET training program to address advanced radiation worker training. This expansion of the NGET program will provide additional emphasis to all radiation workers on practical aspects of work in radiologically controlled areas. This training began in January, 1991 as a pilot program at Braidwood Station. Advanced radiation worker training is expected to begin at Dresden Station during 1991 (237-100-902601A-04).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on October 25, 1990, following implementation of the worker location/task log and the re-emphasis of radiation worker responsibilities with all contractor personnel.