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JUN 21 1971

50-237

Commonwealth Edison Company
 ATTN: Mr. T. G. Ayers, President
 One First National Plaza
 Chicago, Illinois 60690

Gentlemen:

This letter refers to inspections conducted on January 19-21, March 17 and 18, and April 1, 2, and 5, 1971, of your activities authorized under AEC Facility License No. DPR-19. This letter also refers to the meeting between Messrs. H. D. Thornburg and G. Fiorelli, Region III (Glen Ellyn) Office, Division of Compliance, and Mr. R. H. Meagher, Manager of Production, and Mr. B. Lee, Jr., Assistant to the President, at your offices in Chicago, Illinois, on April 21, 1971.

With respect to these inspections, it appears that certain of your activities were not in full compliance with license requirements. These matters, which were discussed with your representatives at the April 21, 1971 meeting, are identified in the enclosure to this letter.

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within 20 days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken; and (3) the date when full compliance will be achieved.

We believe that the type and frequency of noncompliance identified during inspections conducted since the issuance of License DPR-19 indicate that there have been continuing deficiencies in the management controls relating to reactor operations and in the performance and coordination of engineering and administrative activities in support of reactor operations. In your reply to this notice please describe the specific steps taken or planned to improve your management systems for assuring compliance with the provisions of your license and the safety of operations at the Dresden facility.

Very truly yours,

Original signed by
 L. D. Low

Lawrence D. Low, Director
 Division of Compliance

*See attached for
 buck slip for
 M 3 OK
 Low
 6/19*

*I concur in this, but I think
 we are on pretty weak ground
 to cite an operator for not complying
 w/ Appendix B after his plant has been
 operating 1 1/2 years. etc*

OFFICE ▶	JGK CO JGKepler 580	CO RHE	DRY RSBoyd	CO AGIambusso	
SURNAME ▶	JPOreilly	RHEngelken	RSBoyd	AGIambusso	LOW
DATE ▶	6/14/71	6/16/71	6/17/71		

ENCLOSURE

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-237

ITEMS OF NONCOMPLIANCE WITH REGULATORY REQUIREMENTS

1. Paragraph 6.2 of the Technical Specifications requires that detailed written procedures be prepared, approved, and adhered to for operation of all systems and components involving nuclear safety.

Contrary to paragraph 6.2 of the Technical Specifications, detailed written procedures were not prepared nor approved for the following safety related maintenance operations:

- a. There were no preventive nor corrective procedures for the maintenance of reactor instrumentation and electrical systems.
- b. The procedure for removing the high pressure coolant injection system from service had not been reviewed and approved in accordance with Paragraph 6.2.E. Paragraph 6.2.E requires that all procedures described in Paragraph 6.2 shall be reviewed by the Station Review Board and approved by the Station Superintendent or Assistant Station Superintendent.

2. Paragraph 10 CFR 50.59 of the AEC's "Licensing of Production and Utilization Facilities" requires each licensee to perform a written safety evaluation providing the bases for the determination that facility changes, tests, or experiments do not involve an unreviewed safety question.

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Contrary to paragraph 10 CFR 50.59, a written safety evaluation had not been provided for the following changes to reactor systems:

- a. Installation of filters in the air supply line to the main steam isolation valves.
 - b. Modification to the primary system electromatic relief valves.
3. Paragraph 4.1.B of the Technical Specifications requires peak heat flux calculations to be checked daily during reactor power operation.

Contrary to paragraph 4.1.B of the Technical Specifications, discussions with cognizant plant personnel and a review of available records indicated that peak heat flux calculation checks were not being performed on a daily basis.

4. Paragraph 6.1.E.1.f(3) of the Technical Specifications requires the findings of all Nuclear Review Board (NRB) reviews of violations of the Technical Specifications and the Board's recommendations to prevent recurrence to be reported in writing to the Company President.

Contrary to paragraph 6.1.E.1.f(3) of the Technical Specifications, the NRB did not report their findings and recommendations in writing to the Company President in connection with the violation of the Technical Specifications relating to the inoperability of one of the main steam isolation valves during the period of October 27 to November 4, 1970.

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5. Paragraph 6.1.E.2.d(7) of the Technical Specifications requires the Station Review Board to review plant operations to detect potential safety hazards.

Contrary to paragraph 6.1.E.2.d(7) of the Technical Specifications, the results of our inspection indicate that the Station Review Board, in their review of plant operations, failed to review the reactor core flux asymmetry condition in a timely manner. This condition was first observed in May 1970, but was not reviewed by the Station Review Board until September 11, 1970.

6. Table 4.1.1 of the Technical Specifications requires that the functional test of the generator load rejection scram sensor be performed within an interval of not less than one month or more than three months.

Contrary to Table 4.1.1 of the Technical Specifications, the functional test of the generator load rejection scram sensor was not performed between August 5, 1970, and December 4, 1970.

7. Paragraph 6.6.A.3 of the Technical Specifications requires notification within 24 hours by telephone and telegraph to the Region III Compliance Office of any abnormal occurrences, as specified in the Definitions Section of the Technical Specifications.

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SURNAME ▶						
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Contrary to paragraph 6.6.A.3 of the Technical Specifications, the Region III Compliance Office was not informed of an abnormal degradation of one of the boundaries designed to contain the radioactive materials resulting from the fission process. Specifically, a defect of greater than 50 percent of the wall thickness was detected on March 23, 1971, in one of the 10-inch, Schedule 80, core spray nozzle safe ends. This was not brought to the attention of the Region III Compliance Office until April 1, 1971.

- 8. Appendix B to 10 CFR 50, "Licensing of Production and Utilization Facilities" establishes quality assurance requirements for the operation of nuclear power plants.

Contrary to Appendix B to 10 CFR 50, the results of our inspection indicate that the following requirements had not been established for the operation of your Dresden 2 reactor:

- a. Test programs had not been established to assure that the low pressure coolant injection system electrical supply system would perform satisfactorily following initial installation and scheduled maintenance. This was evidenced by the circumstances relating to the problems experienced with this system on February 26 and April 4, 1971 (Criterion XI).

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- b. The surveillance procedure for the high pressure coolant injection system that was effective on December 31, 1970, did not contain test acceptance limits. Furthermore, the test results had not been evaluated to assure that the system flow rate requirements had been satisfied (Criterion XI).

- c. Measures had not been established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits (Criterion XII).

- d. A comprehensive system of audits, including incorporating written procedures or check lists to verify that the surveillance test program complies with Technical Specification requirements, had not been established (Criterion XVIII).

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