

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

OCT 8 1975

Commonwealth Edison Company  
ATTN: Mr. Byron Lee, Jr.  
Vice President  
P. O. Box 767  
Chicago, Illinois 60690

Docket No. 50-10

Docket No. 50-237

Docket No. 50-249

73-19

Gentlemen:

Thank you for your letters dated September 2 and 26, 1975, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in our letter dated August 11, 1975. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

Gaston Fiorelli, Chief  
Reactor Operations Branch

bcc w/ltrs dtd 9/2 & 26/75:

PDR

Local PDR

NSIC

TIC

Anthony Roisman, Esq.,  
Attorney





Commonwealth Edison  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

September 2, 1975

Mr. James G. Keppler  
Regional Director - Region III  
Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Dresden Station Units 1, 2, and 3  
Response to Noncompliance Items Contained in  
Inspection Report Nos. 50-10/75-13, 50-237/75-19,  
and 50-249/75-15, NRC Docket Nos. 50-10,  
50-237, and 50-249

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Dear Mr. Keppler:

Mr. Fiorelli's letter to Mr. Lee, dated August 11, 1975, contained the above referenced inspection report with several items of noncompliance. This letter is in response to those items.

A. Infractions

1. Applicable check off list not completed for the Unit 2 startup.

Corrective Action Taken

This deviation was identified by station personnel, and the required check off list using the current approved form has been completed.

Corrective Action Taken to Prevent Recurrence

To prevent recurrence, the shift engineer's files ensure that only the current approved check list form is available. It is expected that this corrective action along with an itemized index, which references applicable check lists, will prevent recurrence of this type of infraction.

Date of Full Compliance

Full compliance has been achieved with the completion of the review of the shift engineer's files for check lists.

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September 2, 1975

A. Infractions

2.a Operator requalification oral examinations not conducted.

Corrective Action Taken

Oral examinations scheduled to begin in mid-June 1975, are in progress.

Corrective Action Taken to Prevent Recurrence

A new schedule for the qualification program has been initiated in which the oral examinations are scheduled two to three months prior to the licensee's anniversary.

Date of Full Compliance

The program is presently in full compliance with approximately 60 percent of the examinations complete.

2.b No policy or evidence indicating station management annual review of each licensee's performance.

Corrective Action Taken

Action will be taken to prevent recurrence.

Corrective Action Taken to Prevent Recurrence

A formal program of station management review and documentation will be placed into effect in the fall of 1975. This review will be made after the annual examination which will occur approximately two to three months prior to the licensee's anniversary.

Date of Full Compliance

Full compliance will be achieved with the implementation of the formal program in September 1975.

3. Unacceptable UT base line examination results for the Unit 2 core spray safe end and transition pieces not reported to management nor reviewed for acceptability or appropriate corrective action prior to startup of the unit.

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#### Corrective Action Taken

The results of the examinations have been evaluated; and on an interim basis, the radiographic examinations of the safe ends and transition pieces are being used as base line results. These results were acceptable in accordance with applicable ASME Codes.

#### Corrective Action Taken to Prevent Recurrence

A revision will be made to the existing inservice inspection plan, 38-000-11 procedure, to incorporate a requirement that satisfactory completion of the inservice inspection must be documented prior to plant startup.

#### Date of Full Compliance

Full compliance is in effect at this time with the review of the Unit 3 inservice inspection plan. The revision to the procedure will be performed by October 15, 1975. This procedure, as revised, will be used for the Unit 1 inservice inspection program.

#### B. Deficiencies

1. Required records for the operator requalification program not maintained. The following five items concerning records required by the operator requalification program were found not being maintained. In all cases, there is no corrective action for the past records. The corrective action to prevent recurrence and the dates of full compliance are discussed below.

1.a Results of operator evaluations.

#### Corrective Action Taken to Prevent Recurrence

Operator evaluation program documentation has been initiated.

#### Date of Full Compliance

This program is in effect at this time.

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- 1.b Licensed operator review of the procedure revisions, facility changes, and license changes.

Corrective Action Taken to Prevent Recurrence

A required reading book with check off sheets for the operators has been placed in the shift engineer's office, the control room, the Unit 2/3 radwaste control room, and the training center offices. The books contain procedure revisions, deviation reports, plant modifications, license changes, operating orders, and miscellaneous information. The contents of the books and their locations may change as experience dictates. This review technique or equivalent will be maintained to ensure adequate operator training.

Date of Full Compliance

Full compliance is in effect at this time.

- 1.c Licensed operator review of abnormal and emergency procedures.

Corrective Action Taken to Prevent Recurrence

Abnormal procedures and emergency procedures, when changed, will be placed in the required reading book. It is expected that a new procedure will be issued on the average of once per month.

Date of Full Compliance

Full compliance is in effect at this time with the issuance of the reading book.

- 1.d Plant manipulations performed by licensed operators.

Corrective Action Taken to Prevent Recurrence

A log for plant manipulations performed by licensed operators is located in the shift engineer's office and control room. This log is maintained by the licensed operators and provides them a location where they may enter plant manipulations performed while on shift. This record will be transferred to the training department where it will be filed in the individual's files.

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Date of Full Compliance

Full compliance has been achieved by the log in the control room and shift engineer's office and the transfer of these records to the individual's files.

- 1.e The starting and ending of each licensed operator's two-year training program.

Corrective Action Taken to Prevent Recurrence

A record has now been established that indicates the starting and ending of each licensed operator's two-year training program.

Date of Full Compliance

Full compliance is in effect at this time.

2. Violations of 10 CFR 50 Appendix B and the Commonwealth Edison Quality Assurance Manual Procedure 2-52. The following three deficiencies were noted for not maintaining past records. There will be no corrective action taken for past records. The following is a description of each deficiency and the action taken to prevent recurrence and the date of full compliance.

- 2.a Improper records for offsite and onsite training for non-licensed personnel.

Corrective Action Taken to Prevent Recurrence

It has again been stressed to supervisors in the station that the offsite training record for QCP 2-52 is to be completed and forwarded to the training office. This information will be transferred in the training office to the individual's files. The training department has instituted a program to better correlate individual's files and these records are now in place wherever possible.

Date of Full Compliance

Full compliance is in effect at this time.

- 2.b Training personnel on the Quality Procedures not

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accomplished within 30 days of the effective dates.

Corrective Action Taken to Prevent Recurrence

The Quality Procedures have been modified to allow 60 days from the effective date of revised Quality Procedures to provide training. Also, the size of the training staff will be adjusted to accomplish the training in the required period of time.

Date of Full Compliance

Full compliance is in effect at this time.

2.c The lack of periodic reports by the maintenance engineer, operating engineer, and Tech Staff supervisor regarding the status and adequacy of the onsite and offsite training programs being formulated and provided to the station superintendent and training supervisor.

Corrective Action Taken to Prevent Recurrence

As noted in the inspection report, this requirement is optional in the Quality Procedures and is only to be submitted as requested by the station superintendent. The surveillance program for the station has been revised to delete this requirement on a periodic basis. It will be performed only when specifically requested by the station superintendent.

Date of Full Compliance

Full compliance has been achieved with the deletion of the requirement for periodic reports.

This report has been reviewed for proprietary information and none was found.

Very truly yours,



R. L. Bolger  
Assistant Vice President



Commonwealth Edison  
One First National Plaza, Chicago, Illinois  
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Chicago, Illinois 60690

September 26, 1975

Mr. James G. Keppler  
Regional Director - Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Dresden Station Units 1, 2, and 3  
Supplemental Response to Noncompliance Items  
Contained in Inspection Reports Nos. 50-10/75-13,  
50-237/75-19, and 50-249/75-15, NRC Docket  
Nos. 50-10, 50-237, and 50-249

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Dear Mr. Keppler:

The following information is provided to supplement the response provided in the letter dated September 2, 1975 to you concerning the subject noncompliance items. This supplemental information has been discussed with members of your staff.

Infration:

1. Applicable check off list not completed for Unit 2 startup.

Supplemental Corrective Action to Prevent Recurrence:

As indicated in the letter dated September 2, 1975, an itemized index indicating the current revision of each check list is maintained in the working file of check lists. When a revised check list is placed in the file, the index is updated and old copies of the check list are removed. Shift personnel will be instructed to refer to this index and the applicable Operating Procedure before using a check list.

As a further step, procedures for document control are being emphasized as part of the Administrative Procedure revisions which are scheduled to be completed in November, 1975.

Deficiency:

- 1.c Licensed operator review of abnormal and emergency procedures.

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September 26, 1975

Supplemental Corrective Action to Prevent Recurrence:

General abnormal and emergency procedures will be placed in the required reading book when they are changed. If no changes are made to a general abnormal procedure or emergency procedure, it will be placed in the required reading book at least once per calendar year.

If you require further information concerning this matter, please contact this office.

Very truly yours,



R. L. Bolger  
Assistant Vice President