

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

NRC Central Files

MAY 14 1975

Commonwealth Edison Company
ATTN: Mr. R. L. Bolger
Vice President
P. O. Box 767
Chicago, Illinois 60690

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

Gentlemen:

Thank you for your letter dated April 17, 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 March 27, 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/ltr dtd 4/17/75:

IE Chief, FS&EB

IE:HQ (4)

Licensing (4)

Central Files

IE Files

PDR

Local PDR

NSIC

TIC

Anthony Roisman, Esq.





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

April 17, 1975

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

Subject: Dresden Station Units 2 and 3
Response to Enforcement Items
Contained in Inspection Report
No. 50-237/75-06 and No. 50-249/75-06
NRC Dkts. 50-237 and 50-249

Dear Mr. Keppler:

Your Inspection Report, referenced above, contained three infractions and three deficiencies. This letter is in response to the three infractions and two of the deficiencies. Your report indicated that no response was necessary for the third deficiency.

The first infraction concerned the experience qualifications for the Nuclear Engineer as required by ANSI 18.1-1971. The Dresden Technical Staff has been restructured to include a Nuclear Engineering Group. The Lead Station Nuclear Engineer now meets and will continue to meet the ANSI 18.1-1971 qualifications. The other Station Nuclear Engineers report directly to and are under the direct supervision of the Lead Station Nuclear Engineer. Full compliance with the Technical Specifications was met on January 27, 1975, with the reorganization of the Nuclear Engineering Group.

The second infraction referred to the lack of procedures covering the control rod movement scheduled for the flux shaping program conducted on October 31, 1974. An Administrative Procedure (DAP 3-1) has been implemented which identifies the review and approval process which must take place prior to any control rod withdrawals being made. This procedure calls for review and approval of all control rod sequences and planned changes thereto, by the Onsite review and the Station Lead Nuclear Engineer or designated qualified alternate, prior to implementation of such sequences. This

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procedure was implemented on April 14, 1975

An approved procedure to provide direction to the Nuclear Engineer and operating personnel when control rod withdrawals are instituted is currently being planned. Such a procedure will be part of a larger program which will attempt to define the limits of safe operation and possible corrective action in the event it is required. This program is scheduled for completion by July 1, 1975.

Full compliance with the Technical Specifications for procedures for control rod movement have been met as of January 24, 1975. Further action to prevent future occurrences of this type, including a program for directing Nuclear Engineers' activities, will occur about July 1, 1975.

The third infraction concerned the lack of a functional test of the Dresden Unit 2 SRMs prior to performing core alterations early in the present refueling outage. Dresden management misinterpreted the requirements and performed the functional test on December 11, 1974, prior to the insertion of new fuel into the core. Full compliance was met with the successful performance of the test.

The Refueling Outage Procedure (DFP 800-1) has been modified to ensure completion of the functional tests prior to any core alterations. Also, the persons responsible for the Unit 3 outage, just under way, have been informed of this concern.

The first deficiency concerned the lack of documentation of refueling outage activities as required by Procedure 800-XX. The 800 series of procedures, relating to refueling activities, have been reviewed and revised to clean up discrepancies. These procedures will be reviewed with the Nuclear Engineering Group and will be implemented prior to use with the Dresden Unit 3 refueling outage. Full compliance will be met with the commencement of the fuel activities on the Dresden Unit 3 outage, presently scheduled about April 20, 1975.

The second deficiency concerned the use of a superseded revision of a maintenance procedure for the control rod drive overhaul performed by General Electric during the Unit 2 refueling outage. In preparation for this work, General Electric personnel added additional signoffs to the checklist contained in the Dresden Station Maintenance Procedure governing the drive disassembly and reassembly. In the process of these additions, the procedures were retyped with a higher revision number and the same procedure number. The package was then approved as a special operating procedure for

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use on this particular job. Some time after the procedure package was approved, the decision was made to use the Dresden Station Maintenance Procedure instead of the procedure requiring the extra verification.

In the future, changes to special operating procedures will be given an Onsite review for use on a particular job. It should be noted, however, that the revision and approval of a Station procedure as a special procedure does not supersede any procedure found in the Station procedure manuals. Any procedure approved as a special procedure will not bear the same number as any procedure found in those manuals.

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

Very truly yours,



R. L. Bolger

Assistant Vice-President