

MAR 20 1973

Docket Nos. 50-237  
50-249

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

Gentlemen:

This letter refers to inspections conducted on October 3 through 6, October 10, and November 1 and 2, 1972 of your activities authorized under AEC Facility License Nos. DPR-19 and DPR-25 by Mr. Dance of our Region III (Glen Ellyn) Office.

Based on the results of these inspections, it appears that certain of your activities were not conducted in full compliance with AEC requirements. These matters, which Mr. Dance discussed with Mr. Worden at the conclusion of each inspection, are identified in the enclosure to this letter.

After careful evaluation of the license violations identified in the enclosure, this Notice of Violation 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 of explanation in reply, including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

It is necessary that management action be taken to correct these deficiencies identified during the recent inspections and to assure full compliance with AEC requirements in the future. In your reply to this notice, please provide us with your comments regarding those actions taken or planned to improve the effectiveness of your management control systems. We plan to continue to conduct unannounced inspections to ascertain whether such action has been taken. Your

*50-237/249  
insf*

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MAR 20 1979

Commonwealth Edison Company - 2 -

reply to this letter and results of future inspections will provide a basis for us to determine whether any further enforcement action is necessary.

Sincerely,

F. E. Kruesi, Director of  
Regulatory Operations

Enclosure:  
Description of  
Deficiencies

cc: Mr. T. G. Ayres, President  
Commonwealth Edison Company  
P. O. Box 767  
Chicago, Illinois 60690

bcc: J. O'Leary, L  
A. Giambusso, L  
J. M. Hendrie, L  
P. A. Morris, RO  
R. H. Engelken, RO  
H. D. Thornburg, RO  
L. I. Cobb, RO  
R. C. DeYoung, L  
D. L. Ziemann, L  
J. G. Keppler, RO  
J. P. O'Reilly, RO:I  
J. G. Davis, RO:II  
N. C. Moseley, RO:II  
B. H. Grier, RO:III  
J. W. Flora, RO:IV  
R. W. Smith, RO:V  
PDR  
Local PDR  
NSIC  
DTIE

R. F. Fraley, ACRS (3)  
DR Reading File  
DR Central File  
L. Reeder, RO  
GC  
L. V. Gossick, ADR

(SEE PREVIOUS YELLOW FOR CONCURRENCES)

OFFICE ▶					
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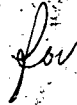
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of last paragraph  
(See next page)  
RWE per FEK 3/19/73*

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DATE ▶					

~~As you are aware from the Criteria for Determining Enforcement Action which was provided to you by my letter of November 1, 1972, the enforcement actions available to us in the exercise of our Regulatory responsibilities include administrative actions in the form of written notices of violation, civil monetary penalties, and orders pertaining to the modification, suspension or revocation of an Operating License. Your reply to this letter and results of future inspections will provide a basis for us to determine whether any further enforcement action is necessary.~~

Sincerely,

Original signed by  
R. H. Engelken



F. E. Kruesi, Director of  
Regulatory Operations

Enclosure:  
Description of Deficiencies

cc: Mr. T. G. Ayres, President  
Commonwealth Edison Company  
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R. F. Fraley, ACRS (3)  
DR Reading File  
DR Central File  
L. Reeder, RO  
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L. V. Gossick, ADR

OFFICE ▶	RO	RO	L	GC	RO
SURNAME ▶	RJMcDermott	RHEngelken	AGiambusso	TG Ayres	FEKruesi
DATE ▶	3/2/73	3/2/73	3/7	3/14/73	3/19/73

Enclosure.

Docket Nos. 50-237  
50-249

Certain of your activities, conducted under License Nos. DPR-19 and DPR-25, appear to be in noncompliance with license requirements as indicated below:

- A. Paragraph 4.7.D.1.c of the Technical Specifications requires that all normally open power-operated isolation valves be tested by fully closing and reopening each valve at least once per quarter.

Contrary to this requirement, certain of the normally open power-operated isolation valves at Dresden 2, including drywell sampling valve Nos. 8501-3A and 3B, were not surveillance tested during the third quarter of 1972.

- B. Paragraph 4.6.D of the Technical Specifications requires that the reactor coolant system leakage be checked by sump and air sampling systems and recorded at least once per day.

Contrary to this requirement, prior to October 10, 1972, data obtained from the containment air sampling system were not being checked or reviewed in a manner that would permit the use of this system as an indicator of leakage from the reactor coolant system.

- C. Paragraph 4.3.B.2 of the Technical Specifications requires that the control rod drive housing support system be inspected after reassembly and the results of the inspection recorded.

Contrary to this requirement, there were no records to substantiate that the control rod drive housing support system at Dresden 3 had been inspected following its reassembly in August, 1971.

- D. Paragraph 3.8.A.1 of the Technical Specifications requires that the radioactive gases released from the plant chimney be continuously monitored. In addition, Paragraph 6.2.A of the Technical Specifications requires that detailed written procedures be prepared, approved, and adhered to for operations of all systems and components involving nuclear safety.

Contrary to these requirements, the Unit 2/3 plant chimney effluents were not continuously monitored and the timely corrective action, specified in facility procedures No. 900-AN-I, was not initiated for a period of approximately 8 hours on July 26, 1972, when the plant chimney monitor was inoperable.

- E. Paragraph 6.6.D.1 of the Technical Specifications requires that a routine operating report be submitted within 60 days after the end of each six-month period calculated from January 1, 1970.

Contrary to this requirement, the routine operating report for the period ending June 30, 1972, was not submitted until September 12, 1972.

- F. Criterion V of Appendix B to 10 CFR 50, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type of appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to these requirements, our review of repair activities on the main steam lines at Dresden 2 disclosed the following deficiencies in proper implementation of documented instructions:

1. A review of records indicated acceptance of radiographs which did not meet the requirements of the ASME Boiler and Pressure Vessel Code, Section III, Appendix IX, Paragraph 3331 and 3326. Specifically, film density of accepted radiographs had not been determined and viewing facilities were not available for measuring the density of radiographs. Furthermore, a filler metal to base metal notch approaching 3/16-inch was observed at several locations on the weld surface which, coupled with available viewing facilities, appeared to mask the area of interest on the radiographic film.
2. Welding rod (Type 7018) was observed to be unprotected from the environs in the immediate vicinity of the work area. This practice was not in accordance with Specification No. 22A2560AB.
3. Records did not establish that weld preparation surfaces had been optically inspected after removal of fitup spacers by grinding as required by Specification No. 22A2560AB.

- G. Criterion VII of Appendix B to 10 CFR 50 requires that measures be established to assure that purchased material conforms to the procurement documents and the documentary evidence that material and equipment conform to the procurement requirements be available at the nuclear power plant.

Contrary to this requirement, records were unavailable at the Dresden site to substantiate that the weld purge dams and glues used in the repairs of the main steam lines at Dresden 2 were water soluble and of low chloride content as required by Specification No. 22A2560AB.