

Commonwealth Edison Company  
Dresden Generating Station  
6500 North Dearborn Road  
Dresden, Illinois 61821  
Tel: 815 942-2920

010/94-018

*Response to  
violation for  
report 94018*

**ComEd**

January, 9 1995

TPJ LTR. #95-0001

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk


Subject: Dresden Nuclear Power Station Units 2 and 3 Responses  
to Notices of Violation; Inspection Report 50-  
010/94018; 237/94018; 249/94018  
NRC Docket Numbers 50-010; 50-237 and 50-249

Reference: E.G. Greenman letter to J. Stephan Perry, dated  
December 9, 1994 transmitting Inspection Report  
50-010/94018; 50-237/94018; 249/94018.

Enclosed as Attachment 1 is Commonwealth Edison Company's (ComEd) response to Notice of Violation regarding failure to follow Dresden Station Technical Specification 6.2.A.1, which states written procedures shall be established, implemented and maintained, which was transmitted with Inspection Report 50-010(237)(249)/94018. The response is being submitted as requested in the referenced letter.

If your staff has any questions concerning this letter, please refer them to Peter Holland, Dresden Station Regulatory Assurance Supervisor, at (815) 942-2920, extension 2714.

Sincerely,



Thomas P. Joyce  
Site Vice President  
Dresden Station

TPJ/klis

Attachments: As described

cc: J. B. Martin, Regional Administrator, Region III  
J. F. Stang, Project Manager, NRR (Unit 2/3)  
P. B. Erickson, Project Manager, NRR (Unit 1)  
M. N. Leach, Senior Resident Inspector, Dresden  
File: NRC Inspection Report 50-010(237)(249)/94018  
File: Numerical

~~9501470072~~ 950109  
PDR ADOCK 05000010  
Q PDR

*SP*

IE01  
11

ATTACHMENT 1  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-010(237)(249)/94018

**VIOLATION:** (50-237/249-94018-01A & B)

1. Technical Specification 6.2.A.1 stated written procedures shall be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which included procedures for abnormal conditions and the control of radioactivity.

- A. Dresden Operations Abnormal Procedure 0010-10, "Fire/Explosion," Revision 3, stated that if a fire is located inside the protected area, the location is to be announced twice on the public address system.

Contrary to the above, on October 24, 1994, operators failed to announce over the public address system a trash fire inside the protected area west of the Unit 2/3 cribhouse building.

- B. Dresden Administrative Procedure 12-33, "Control of Radioactive Material," Revision 2, stated that all radioactive material moved from a posted area shall be escorted by a qualified radiation protection department member unless the movement is otherwise authorized and controlled by other special written instructions, such as a procedure or radiation work permit.

Contrary to the above, on October 27, 1994, radioactive material as contamination on an instrument for measuring equipment vibration was moved from a posted area and was not escorted or otherwise authorized and controlled.

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

**REASON FOR VIOLATION:**

- A. On October 24, 1994, the Control Room was notified of a trash fire inside the protected area west of the Unit 2/3 cribhouse building. The Operators involved, sounded the fire alarm and announced the fire on the Station radio (twice) in accordance with Dresden Operating Abnormal Procedure (DOA) 0010-10. Immediately following the completion of these two actions, the Operators received communication from the Shift Manager over the radio that the fire was extinguished. As a result, the Operators made a conscious decision to exit DOA 0010-10 without making the announcement over the public address system, which was a procedural requirement.

ATTACHMENT 1  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-010(237)(249)/94018  
(Continued)

**REASON FOR VIOLATION:** (continued)

- B. On October 27, 1994, a Radiation Protection Technician, (RPT), was dispatched to the Mechanical Maintenance Department (MMD), to perform an unconditional release on two vibration analysis machines for Lovejoy contractor personnel. During the survey the RPT noticed a radiation sticker on the outside of one of the vibration analysis machines. The sticker was faded and the RPT was unable to read the information it provided. The RPT instructed the contractor to take the vibration analysis machine to the rad office where a tool monitor was located, which could be utilized to determine whether or not the machine was contaminated. Although the other vibration analysis machine was releasable, the RPT requested that both machines be taken to the rad office. The contractor accompanied by the RPT took the machines to the rad office where the RPT utilized the tool monitor to perform the survey. The tool monitor alarmed on the vibration analysis machine with the radiation sticker, indicating it was contaminated.

An investigation was performed to determine the root cause of this event. The investigation identified the practice of LoveJoy personnel was to transfer their equipment down the back stairs from the Unit 1 Main Turbine Building, which violates Dresden Radiation Procedure (DRP) 1480-7, which contains the requirements of having material surveyed upon exiting the RPA. The investigation also identified that LoveJoy personnel were instructed by the Radiation Protection Department that this exit route was to be used only in the case of an emergency and not for normal entry and exit to the RPA. This information was posted on the identified doors, However, the posting on the doors was not recognized by Lovejoy personnel utilizing this route.

ATTACHMENT 1  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-010(237)(249)/94018  
(Continued)

**CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:**

- A. Control Room Operators were counseled by the Shift Manager on procedural adherence and how it related to this event to ensure that when the fire alarm is initiated a public address announcement stating the location of the fire must be made.

Control Room Operators understand the importance of making the announcement over the Public Address System.

The Operators involved recognize and acknowledge their error, and the requirement to make the announcement over the Public Address System.

- B. The following activities were initiated and completed on October 27, 1994.

A new radiation sticker was issued and placed on the identified vibration analysis machine and transported to the Unit 1 MTF.

A PIF was generated and the Shift Manager notified of the Radioactive material found outside of the RPA.

A survey was performed in the contractors office to determine if any contamination was present, no contamination was found.

Lovejoy personnel involved in this event were counseled by Radiation Protection personnel and now recognize and acknowledge their error. They also understand the requirements for material being removed from the RPA.

An investigation was initiated on October 27, 1994 and completed in November, 1994, which addressed the Vibration Analysis Machine being removed from site. Results were inconclusive if the machine in question was removed from site in a contaminated condition.

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:**

- A. Control Room Operating personnel have been counseled by the Shift Manager, no further action is required.
- B. The Lovejoy personnel involved in this event have been counseled by Radiation Protection personnel, no further action is required. However, the following activities are currently in progress or have been completed, which reflect our efforts to address this area of concern for Dresden Station:

**ATTACHMENT 1**  
**RESPONSE TO NOTICE OF VIOLATION**  
**NRC INSPECTION REPORT**  
**50-010(237)(249)/94018**  
**(Continued)**

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:** (continued)

- \* The Radiation Protection Department is in the process of conducting a baseline survey, which includes the MM and EM Shops along with the locker rooms. These surveys will be completed by March 31, 1995.
- \* The Radiation Protection Department is reviewing the current status of Dresden Station's Satellite RPAs to identify and address the actions necessary to reduce them. This review will be completed by March 31, 1995.
- \* There are several other exits from the main RPA in the form of security doors and rollup doors. These exits have been posted by Radiation Protection and instruct the worker to contact RP prior to opening. Furthermore, the signs state that RP personnel must be present prior to opening.
- \* Radiation Protection started a new program in October of 1994. The program consists of RPTs, known as Rovers, which are in the RPA on a continual basis Monday thru Friday. The Rovers respond to workers needs by the use of radio communication between the RP Unit foremen and the Rovers. This action will assist RPTs to identify and resolve potential problems before they occur (ie: radioactive material exiting the RPA without RP permission).
- \* Access to the Hot Tool Shop was re-instated during the month of November. (This area had been restricted due to a contamination event on the floor)
- \* The methods and equipment utilized by RPT's to perform surveys follows a standard practice of:

Utilizing a tool monitor as the first method of performing surveys as size permits

Utilizing a HP 210 Monitor for all over-sized items

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

- A. Dresden Station is in full compliance.
- B. Dresden Station will be in full compliance by March 31, 1995.

The Station will keep the NRC Resident Inspector informed of the corrective action progress.