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JUN 18 1980

June 13, 1980

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

Subject: Dresden Station Units 1, 2, and 3
Response to I.E. Inspection Report
Numbers 50-010/80-09, 50-237/80-08,
50-249/80-12
NRC Docket Nos. 50-10/237/249

Reference (a): J. Keppler letter to C. Reed dated
May 23, 1980

Dear Mr. Keppler:

The following is in response to an inspection conducted by Messrs. J. Barker and T. Tongue on April 7 - May 2, 1980, of activities at Dresden Nuclear Power Station Units 1, 2, and 3. Reference (a) indicated that three items appeared to be in non-compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison Company's response to the identified items of non-compliance.

Item #1 in the Notice of Violation enclosed with Reference (a) is a recurrent item, and we share your concern that effective management controls must be implemented to prevent a further occurrence. Our review of each of the past occurrences has indicated that a small number of the many contractor personnel on-site has most likely been the major contributors to these poor radiation practices, that corrective actions to implement improved controls were taken after each non-compliance, and that station management has acted in a responsible fashion to tighten and further improve those controls after additional infractions have occurred.

The men identified as contributing to the September, 1979, non-compliance were admonished to follow proper radiation protection rules and were sent to two, separate, initial radiation protection training classes to ensure their understanding of the rules. After the December, 1979, recurrence of drinking and smoking was found, patrols were instituted in an attempt to determine the individuals involved. Two individuals, employed by contractors, were found violating station procedures. Both of the individuals were fired.

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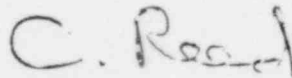
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Meetings were held in January, 1980, with all contractor management and with the appropriate business agents to ensure the station procedures and rules were clearly understood. Finally, following this most recent occurrence, relatively unoccupied areas have been locked, patrol frequencies have been increased, additional "tailgate" sessions have been held, and pocket-sized summaries of "do's and dont's" are being prepared for issuance to all contractor personnel. On April 18, 1980, another contractor employee was found smoking in a Unit 1 controlled area and was immediately fired.

These corrective actions were reviewed for adequacy with Dresden Station management during a conference call with the Vice President of Nuclear Operations and representatives of the Nuclear Stations Division, the Nuclear Licensing, and Station Construction Departments.

- We believe that the above actions, supplemented by the attention these events have received, demonstrate effective management control at the station and that no further action is now warranted.

Very truly yours,



C. Reed
Vice President of
Nuclear Operations

Attachment

ATTACHMENT A

COMMONWEALTH EDISON
ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION

The items of non-compliance identified in Appendix A of the NRC letter dated May 23, 1980, are responded to in the following paragraphs:

1. Unit 1 Technical Specifications, Section 6.2.B., requires that radiation control procedures be maintained, made available to all station personnel, and adhered to. Radiation Control Standards Procedure 37-1-E-3, "Work in Controlled Areas (Radiation Areas and High Radiation Areas)", requires that personnel not eat, drink, smoke, or chew in those controlled areas.

Contrary to the above, on April 17, 1980, while making a routine tour of the Unit 1 Turbine Building (a posted radiation area), the NRC inspector observed evidence of eating, drinking, and smoking (i.e., the presence of numerous cigarette butts, empty soft drink cans, empty candy wrappers, and a half eaten hamburger) in this radiation area. This is a repetitive item of non-compliance since the same problem was identified twice previously in NRC Inspection Reports No. 50-010/79-19, dated October 18, 1979, and No. 50-010/79-25, dated January 28, 1980.

Corrective Action Taken and Results Achieved

The immediate actions taken were to clean up those areas in the Unit 1 Turbine Building where evidence of eating, drinking, and smoking were observed and to increase the frequency of guard patrols of the area from six times per day to occupying and patrolling the area 12 hours per day for the duration of the recent Unit 3 outage, when extensive contracting was being done. Proper lighting was restored in several infrequented areas of Unit 1 by relamping. The improved lighting should help to discourage individuals from unauthorized use of these infrequently occupied areas. Also, to further eliminate the possibility of contractors using these relatively unoccupied areas as eating places, the entrance to the ground floor of the Unit 1 Turbine Building across from the vending area was locked with Dresden Station personnel locks, to which only Dresden employees have keys.

No additional recent evidence of eating, drinking, or smoking has been observed in the Unit 1 Turbine Building.

Corrective Action Taken to Avoid Further Non-Compliance

On April 28, 1980, a meeting was held by Dresden Station management and Commonwealth Edison Construction Department management to discuss corrective action regarding violations of station procedures. The infractions were discussed and actions to correct them were identified and assigned to individuals for completion. The following corrective measures were identified:

- (1) The Station Newsletter was used to reinforce, for all personnel, adherence to station procedures and the possibility of disciplinary action for violators.
- (2) Each Station Department and the Construction Department held "tailgate" sessions with their personnel on the importance of plant cleanliness and the hazards of eating and drinking in controlled areas.
- (3) The Station Quality Control Department has begun conducting surveillances throughout the plant to ensure compliance with station procedures for cleanliness and to search for any evidence of eating, drinking, and smoking in controlled areas.
- (4) Station Operating Engineers and Assistant Superintendents have been directed to conduct more frequent rounds in their areas of the plant and to look for violations of station procedures regarding plant cleanliness and plant radiation protection procedures.
- (5) A convenient pocket-sized summary of important "do's and dont's" is being prepared for issuance to contractor personnel when they come to the site emphasizing certain rules and practices which they must follow. Plant cleanliness rules, radiation protection practices, and security procedures are mentioned. They are warned that a failure to comply with these "do's and dont's" will lead to discharge. These cards will be available for use by August 1, 1980.

Date When Full Compliance Will Be Achieved

We believe full compliance has been achieved at this time, but the summary cards listing important "do's and dont's" will not be available for issuance until August 1, 1980, due to the time needed to have the cards printed.

2. 10 CFR 50, Appendix B, Criterion II requires activities affecting quality be accomplished under suitably controlled conditions, including adequate cleanliness. The licensee's Quality Assurance Program, Section 2.2, requires that the licensee adhere to all mandatory requirements of ANSI N18.7. ANSI N18.7/1976, Section 5.2.10, requires quality housekeeping practices encompassing all activities related to control of fire prevention and protection, including disposal of combustible material and debris.

Contrary to the above, on April 17, 1980, during a routine tour of the Unit 1 Sphere, the NRC inspector observed numerous oily rags/papers, a tipped over lube oil can, and scattered debris above the elevator shaft which was not being controlled and which represented a fire hazard.

Corrective Action Taken and Results Achieved

The areas above the elevator shaft were cleaned up and a locked gate placed at the bottom of the stairs leading up to the top of the elevator shaft.

Corrective Action To Be Taken To Avoid Further Non-Compliance

The Station procedure governing inspections for fire protection hazards, Dresden Administrative Procedure DAP 7-12, was reviewed and judged to be deficient and too general. The procedure will be revised to more specifically identify individual responsibilities, items to be examined, and frequency of inspections.

Date When Full Compliance Will Be Achieved

The revision to DAP 7-12 will be completed and approved for Station use by August 1, 1980.

3. Unit 1 Technical Specifications, Section 6.2.B, requires that radiation control procedures be maintained, made available to all station personnel, and adhered to. Radiation Control Standards Procedure 37-1-A-1 requires that contaminated clothing should be removed from controlled contaminated areas when not in use and, further, requires that clothing hampers marked "Deposit Contaminated Rubber Goods Here" and "Deposit Contaminated Canvas Goods Here" be placed at the exits from all areas where protective clothing is required.

Contrary to the above, on April 17, 1980, during a routine tour of the Unit 1 Turbine Building, the NRC inspector observed contaminated clothing lying inside a controlled contaminated area (Unit 1 condensate demineralizer control area) and that no clothing hampers were located at the exit of this area. This condition was determined to have existed for a period of two weeks.

Corrective Action Taken To Avoid Further Non-Compliance

Areas in the plant which are frequently used as change areas will be identified and checked to ensure receptacles for contaminated clothing exist at the area. We feel that the greatly improved cleanliness surveillance program will eliminate the possibility that unused contaminated clothing will be left lying in controlled areas for long periods of time.

Date When Full Compliance Will Be Achieved

The change areas will be identified and checked for proper receptacle placement by August 1, 1980. Full compliance will be achieved at that time.