



Commonwealth Edison
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June 9, 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 Unit 1
Response to IE Inspection Report
No. 50-10/80-08
NRC Docket No. 50-10

Reference (a): A. Davis letter to C. Reed dated
May 16, 1980

Dear Mr. Keppler:

The following is in response to an inspection conducted by Mr. R. Paul on March 3, 4, 5, 7, 13, 14 and April 8 and 9, 1980, of activities at Dresden Nuclear Power Station Unit 1. Reference (a) indicated that two items appeared to be in noncompliance with NRC requirements. Attachment to this letter contains Commonwealth Edison Company's response to the identified items of noncompliance.

Please address any questions concerning this matter to this office.

Very truly yours,

D. L. Peoples
Director of
Nuclear Licensing

Attachment

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ATTACHMENT A

COMMONWEALTH EDISON
ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION

The items of noncompliance identified in Appendix A of the NRC letter, dated May 16, 1980, are responded to in the following paragraphs.

1. 10 CFR 20.201(b) requires that each licensee shall make or cause to be made such surveys as may be necessary to comply with the regulations in Part 20.

Contrary to this requirement, no timely survey (evaluation) was made upstream of the composite sampler in the discharge canal on April 5, 1980, after an unplanned liquid release from Unit 1, to ensure compliance with 10 CFR 20.106(a).

Corrective Action Taken and Results Achieved

Although a series of samples was taken on April 5 at the composite sampler and downstream of it near the discharge into the Illinois River, the personnel involved failed to recognize a need to take upstream samples. The people involved have been reminded of the need for upstream sampling, especially when the canal discharge rates are very low, as they are now, i.e., when the circulating water pumps are shut off.

Corrective Action to be Taken to Avoid Further Noncompliance

Additional corrective action to be taken will involve adding a caution statement to the river water analysis sheet, used when determining the canal activity, as a reminder that upstream and downstream sampling shall be initiated whenever the river discharge water exceeds 100 pCi/l.

Date When Full Compliance Will be Achieved

Full compliance was achieved on May 29, 1980.

2. Technical Specification 3.8.C.2 states, in part, that concentrations of gross beta activity in the condenser cooling water discharge canal shall not exceed $1E-7$ microcuries per milliliter unless the discharge is controlled in accordance with 10 CFR 20 limits.

Contrary to this requirement, as the result of an uncontrolled release, concentrations of $1.8E-6$ and $3.7E-6$ microcuries per milliliter of gross beta activity existed in the discharge canal on April 5 and 6, 1980.

Corrective Action Taken and Results Achieved

The activity that was released into the canal resulted from a tube

Corrective Action Taken and Results Achieved (Continued)

failure in the "B" unloading heat exchanger that was being used to heat up the primary system by use of steam from the auxiliary boiler. At 1526 hours on April 5, 1980, the "B" unloader heat exchanger was isolated, and the condensate return line from the heat exchanger to the service water system was valved closed. This effectively terminated the leakage from the primary system to the discharge canal via the service water.

On May 5, 1980, a daily sampling and analysis program for gross beta activity was initiated for the Unit 1 service water discharge from the sphere. The results of this sample will provide an earlier alert of possible radioactivity release prior to exceeding Technical Specification limits.

On May 16, 1980, the crosstie to the service water system from "B" unloader heat exchanger condensate line was cut and capped. This will prevent future radioactive releases from this heat exchanger to the service water system.

Corrective Action to be Taken to Avoid Further Noncompliance

The capping of the crosstie between the "B" unloader heat exchanger and the service water eliminates this heat exchanger as a source of future radioactive releases; the sphere service water discharge sampling program will monitor for any radioactive leaks from all other possible contributors within the sphere.

We believe no further corrective action is necessary.

Date When Full Compliance Will be Achieved

We believe full compliance has been achieved at this time.