



**Commonwealth Edison**  
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July 24, 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 IE Inspection Report  
Nos. 50-10/80-11, 50-237/80-11, and  
50-249/80-15  
NRC Docket Nos. 50-10/237/249

Reference (a): A. B. Davis letter to C. Reed dated  
July 3, 1980

Dear Mr. Keppler:

The following is in response to an inspection conducted by Mr. C. C. Peck on April 28, 1980, of a shipment of radioactive waste from Dresden Nuclear Power Station that arrived at Nuclear Engineering Co., Richland, Washington. Reference (a) indicated that one item appeared to be in non-compliance with NRC requirements. Attachment A to this letter contains Commonwealth Edison Company's response to the identified item of non-compliance.

Please address any questions concerning this matter to this office.

Very truly yours,

Robert F. Janecek  
Nuclear Licensing Administrator  
Boiling Water Reactors

Attachment

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ATTACHMENT A

Commonwealth Edison

Attachment

Response to Notice of Violation

The item of non-compliance identified in Appendix A with the NRC letter dated July 3, 1980, is responded to in the following paragraphs.

1. As required by 10 CFR 71.5, shipments of licensed radioactive materials must comply with the requirements of the Department of Transportation, 49 CFR 170-189. 49 CFR 173.392 (c) (1) requires that low specific activity (LSA) materials be packaged in strong, tight packages.

Contrary to the above, one drum of LSA waste was discovered upon arrival at the Nuclear Engineering Company, Richland, Washington, to have a defective closure so that the lid was not securely attached to the drum.

Corrective Actions and the Results Achieved

On April 28, 1980, Dresden was notified by Don S. Romine, State of Washington Department of Social and Health Services of the non-compliance, and that the Dresden burial site access permit was suspended. All waste shipments to Richland, Washington from Dresden were cancelled until a thorough review of our quality assurance and operating procedures could be performed, revisions completed, and submitted for review by the Washington Department of Social and Health Services.

From January 1, 1980, to April 28, 1980, Dresden had shipped a total of 766 drums to the Richland, Washington burial site. This one drum was the first reported to have had an inadequate closure. Loosening of this drum closure was either due to improper sealing of the drum or undue stress on the drum closure due to improper loading of the drum onto the trailer.

Corrective Actions Taken to Avoid Further Non-Compliance  
and Date of Full Compliance

Operating procedures DOP 2000-22 and 39 were reviewed and revised to include instructions on proper drum sealing, loading, and inspections of drum closures prior to, during, and following final loading onto the trailer. Also, corporate Quality Assurance Procedure QP13-52 was revised to assure inspection of drum closures prior to shipment off-site. These revised procedures were implemented and submitted to the Washington Department of Social and Health Services for their review on May 8, 1980. Dresden's burial site access permit was reinstated on May 14, 1980. Full compliance was achieved on May 8, 1980.