



Commonwealth Edison
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January 17, 1975

Mr. James G. Keppler
Regional Director
Directorate of Regulatory
Operations - Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Reply to Item A of the Enforcement Section
of Inspection Report Nos. 50-10/74-13 and
50-10/74-09, Dresden Station Units 1 and 2
AEC Docket Nos. 50-10 and 50-237

Dear Mr. Keppler:

This is in response to Mr. Gaston Fiorelli's letter of December 26, 1974 to Mr. Byron Lee, Jr. containing the above referenced inspection reports. As noted in the inspection reports, only Item A of the Enforcement Section requires a response.

The inspection by your office was performed after the job was past the points where the procedural violations occurred. Therefore, there was no immediate corrective action for Items A.1.a and A.2.b.

Item A.1.b states that a temporary change, processed correctly, changed the intent of the original procedure and therefore was a violation. It is felt that the technical specifications were not violated through the use of a temporary procedure change to remove the secondary backup seal (Plidco clamp) to facilitate the welding of the pipe to weld-o-let. The situation which developed to require such a change was as follows:

After the old pipe had been cut off and the weld-o-let preparation made, the fitup of the new pipe to the weld-o-let began. It was noted that the plans of the old pipe and the plan of the prepared weld-o-let were not the same. This caused the rod on the sealing tool to be out of center. In order to install the Plidco clamp, the rod would have had to been moved to the center, thus moving the sealing tool. It was felt that this presented an increased chance of losing the seal. In order to complete the job in the safest manner, the weld should be made with the Plidco clamp.

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removed. It is Commonwealth Edison's position that the purpose of the repair procedure, SPM-19, was to repair the leak in a safe manner. The procedure change was made to adhere to that purpose in light of changing condition.

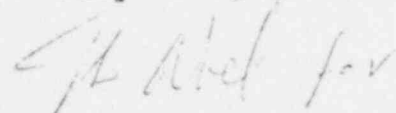
Item A.2.a states that the 10 CFR 50.59 safety evaluation form for the change to the hydro test procedure did not address the change in question. A review of the 10 CFR 50.59 form determined that it did address the change in question which was the requirement to gag the safety valves. The evaluation stated that, with the reactor less than 212°F and all rods inserted, there was no technical specification requirement to have the safety valves in service; therefore, the valves could be gagged. Commonwealth Edison believes that this evaluation was proper and met the requirements for the change to the procedure.

Each of the violations contained in Item A reflects a violation of the proper use of temporary and permanent procedures as discussed in QP5-51 of the Commonwealth Edison Quality Assurance manual. Subsequent to the repair of the recirculation line, training has been conducted at Dresden Station in accordance with commitments made on previous inspections. Special emphasis was placed on the use of temporary procedure changes. Also emphasized was the point that temporary changes cannot change the intent of the original procedure. This training was completed on October 9, 1974 and completes the corrective action taken to avoid future violations.

These inspection reports have been reviewed for proprietary information and none was found.

If further questions should arise, please contact this office.

Very truly yours,



Byron Lee, Jr.
Vice-President

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