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July 2, 1974

Mr. J. G. Keppler
Regional Director
Directorate of Regulatory
Operations - Region III
U.S. Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Dresden Station Units 1, 2 and 3 -
AEC Regulatory Operations Inspection -
May, 1974, AEC Dkts 50-10, 50-237 and 50-249

Dear Mr. Keppler:

In response to your letter of June 10, 1974 (received June 13, 1974) the following reply is provided in accordance with 10 CFR, Part 2, Section 2.201. This reply addresses the Enforcement Action section of the Summary of Findings in your letter.

During April, May and June, 1972 and January and November, 1973, supplemental environmental monitoring measurements were not obtained when airborne releases of iodine and particulates exceeded 1/3 of the Technical Specification limit. These samples were not taken because the Technical Specification requirement had not been implemented by a station procedure. To ensure proper sampling is initiated in the future an iodine and particulate monitoring procedure will be developed which will define appropriate action if effluents exceed 1/3 of the Technical Specification limit. This procedure will be implemented by July 12, 1974.

Since in our judgment the routine monitoring programs are adequate for all releases below the Technical Specification limits, and supplement measurements required by Specification 4.8.E provide no additional environmental protection, a Technical Specification change to delete this requirement will be submitted by August 12, 1974.

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A review of environmental data for the periods in question was reviewed to confirm that the release had no effect on doses. No change in the data related to Off-Site dose pathways was found which indicates any effects were negligible. The confirmation of negligible dose effect is consistent with the results of fifteen years of routine environmental monitoring at Dresden Station and various special studies including the recently completed AEC study of Iodine-131 in air, water and milk at Dresden Station reported in IAEA/SM-180/44. Public health and safety were adequately protected during the period of these violations.

Your "Report Details" discuss the management control system for the environmental monitoring program. Your understanding is basically accurate, but some clarification may be beneficial. As required by Section 6 of the plant Technical Specifications, administration of the environmental monitoring program is the responsibility of the Station Superintendent and auditing of the program is the responsibility of the Superintendent of Nuclear and Fossil Systems. The Environmental Affairs Department functionally coordinates the various environmental monitoring contractors. This centralized coordination facilitates the use of single contracts for all nuclear stations. Cognizant individuals from the Environmental Affairs Department may be selected by the Superintendent of Nuclear and Fossil Systems to assist in preparing and conducting audits.

If you have any questions with regard to this response contact my office at your convenience.

The inspection report was reviewed for proprietary information and none was observed.

Very truly yours,

Byron Lee Jr
Byron Lee, Jr.
Vice-President