



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

John

September 22, 1978

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

Subject: Dresden Station Units 1, 2 and 3
 Response to I.E. Inspection Report
 Nos. 50-10/78-23, 50-237/78-21,
 and 50-249/78-23
NRC Docket Nos. 50-10/237/249

Reference (a): A. B. Davis letter to B. Lee, Jr.
 dated September 8, 1978

Dear Mr. Keppler:

The following is in response to an inspection conducted by Mr. L. R. Greger on August 7-10, 1978 of activities at Dresden Station. Reference (a) indicated that one item appeared to be a deviation from commitments which we had made in previous correspondence with the NRC. Our response to this item is addressed in the attachment to this letter. The liquid radwaste discharge monitor which was tested during 1977 at Dresden will be returned to service and an alarm will be made operational with it. Additionally, an evaluation of the monitor's performance, in accordance with 10 CFR Part 50.59, will be made to resolve any remaining differences between the monitor and the FSAR description.

Please refer any additional questions you might have on this subject to this office.

Very truly yours,

C. Reed

Cordell Reed
 Assistant Vice-President

LPDR

attachment

7810110277

PDR ADOCK 50-010 Q
 PDR ADOCK 50-237 Q
 PDR ADOCK 50-249 Q

SEP 23 1978

Response to Notice of Deviation

The item of deviation identified in Appendix A to the NRC letter dated September 8, 1978 is responded to in the following paragraphs.

Contrary to the licensee's commitment in Section 7.6.2.5 of the FSAR to provide a liquid radwaste monitoring system capable of showing changes in discharge radiation levels and alarming when the radiation levels approach the limitation for station discharge, in order to provide an additional check on the radiochemistry analyses, the Unit 2/3 liquid radwaste monitor was not capable of detecting radiation levels corresponding to the technical specification discharge limit from January 1978 through the time of this inspection due to excessive internal and external background radiation levels.

Corrective Action to be Taken

An off-line liquid radwaste discharge process monitor was installed at Dresden Unit 2/3 radwaste for test purposes to investigate its performance in meeting the FSAR minimum sensitivity requirement of $3 \times 10^{-6} \mu\text{Ci/cc}$. Installation, calibration, and testing of this monitor was completed in December, 1977. Results of these tests indicated a minimum sensitivity of $1.1 \times 10^{-5} \mu\text{Ci/cc}$.

Even though this off-line monitor does not meet the FSAR minimum sensitivity requirement, a re-evaluation of its performance indicates that it is capable of detecting radiation levels in liquid discharges corresponding to technical specification limits when dilution factors are considered. Therefore, the off-line monitor will be returned to operation.

In order to implement the use of the off-line liquid radwaste discharge monitor, three items must be completed. An evaluation in accordance with 10 CFR 50.59 must be made of any deviations from the FSAR description of the liquid discharge monitors. This review will be completed by October 15, 1978. Operating procedures for the use of the off-line liquid process monitor during discharges from Unit 2/3 radwaste will also be written and approved by October 15, 1978. The necessary alarm

unit with the monitor is not functional at this time. The necessary actions to make the alarm operational will be completed by November 15, 1978.

Date When Full Compliance Will be Achieved

Full compliance with the FSAR description of the liquid radwaste discharge monitor will be achieved by November 15, 1978.