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

January 14, 1983

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

> Subject: Response to Item of Non-Compliance in
> I.E. Inspection Report No. 50-249/82-28
> Dated December 17, 1982.
> NRC Docket No. 50-249

Reference (a): W. S. Little letter to Cordell Reed
Dated December 17, 1982.

Dear Mr. Keppler:

Reference (a) transmitted the results of the routine
inspection conducted by Mr. D. L. Robinson on November 9, 10, and
12, 1982, of activities at Dresden Nuclear Power Station, Unit 3.
The Appendix to Reference (a) identified one item of non-compliance
with NRC requirements. Our response to this item of non-compliance
is responded to in Attachment A to this letter.

Please address any questions you may have concerning this
matter to this office.

Very truly yours,

Thomas Rausch

for L. O. DelGeorge
Director of Nuclear Licensing

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Attachment

cc: Region III Inspector - Dresden

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Attachment A

Response to Notice of Violation

The item of non-compliance identified in Appendix A of the NRC letter, dated December 17, 1982 is responded to in the following paragraphs:

> 10 CFR 50, Appendix B, Criterion VI states in part that measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

> Contrary to the above:

> Measures had not been established to assure that changes to procedures were reviewed for adequacy and approved for release by authorized personnel. Specifically, Revision 3 of DTS 8237, "Calculation of Core Thermal Power - Technical Staff Method", was reviewed by the Dresden On-Site Review Committee and approved for release, distribution, and use without review and approval of the computer program involved.

1. Corrective Action Taken and Results Achieved

The procedure in question permits the Technical Staff Engineer to independently calculate the core thermal power. The routine method for determining the core thermal power and the APRM gain adjustment factors in compliance with the Technical Specifications is performed by the Reactor Operators with Dresden Operating Surveillance (DOS) 500-6, "APRM Gain Adjustment". Both procedures, DTS 8237 and DOS 500-6, indicate that the primary means for calculating the core thermal power is with the process computer. When the process computer is not available, a hand heat balance calculation may be performed using a Monroe desk top calculator and manually input sensor readings. The inspector noted that the Technical Staff Procedure provided for an alternate backup method. This procedure referenced the use of the new PRIME computer program entitled SUBCTP2 which was undergoing operational testing. The review package for this program was completed on November 16, 1982. To permit the use of this backup in a timely manner, the procedure revision and operational testing using DTS 8080 were initiated concurrently. Unexpected problems were encountered during the program testing which delayed its approval for use. Meanwhile, the procedure revision progressed as normal and eventually was on-site reviewed. Although technically the procedure was approved before the computer program was reviewed and approved using procedure DTS 8080, we believe that this was not a critical problem for a number of reasons.

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First, an attempt is always made to train the appropriate personnel on
the use of a new system prior to its implementation. Included in this
training is a review of the pertinent procedure. Therefore, a copy of
the final procedure is very useful. Second, this program is an alternate
backup to the normal method (process computer) for determining core ther-
mal power. As such, use of this option has been shown to occur less than
once per year. Finally, the application of a hand heat balance calcula-
tion requires the inclusion of a conservatism factor as stated by this
procedure. The user is referenced to the reviewed documentation package
for SUBCTP2. Since this package was not complete as discussed above, the
user would be unable to complete the calculation.

2. Corrective Action Taken to Avoid Further Non-Compliance

We believe that additional corrective measures are not required
based on the above information and the fact that personnel who reviewed
the procedure understood that a safeguard existed to prevent the use of
SUBCTP2 even though it was mentioned in procedure DTS 8237 because of
our requirement to use DTS 8080 to approve new computer programs or
revisions to existing programs.

3. The Date When Full Compliance will be Achieved

As discussed above, we believe the intent of the requirements has
been met and that compliance was already achieved.