



Commonwealth Edison
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Address Reply to: Post Office Box 767
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August 18, 1982

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: Dresden Nuclear Power Station
Units 1, 2 and 3
I&E Inspection Report Nos.
50-010/82-06, 50-237/82-10,
50-249/82-11, dated July 19, 1982
NRC Docket Nos. 50-010/23/249

Reference (a): R. L. Spessard letter to Cordell
Reed dated July 19, 1982.

Dear Mr. Keppler:

Reference (a) transmitted the results of the routine resident inspection conducted by Messrs. T. M. Tongue and M. J. Jordan on May 7 through June 4, 1982, of activities at Dresden Nuclear Power Station Units 1, 2 and 3. The Appendix to Reference (a) identified one item of noncompliance with NRC requirements. Our response to this item of noncompliance is responded to in Attachment A to this letter.

To the best of my knowledge and belief the statements contained in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

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

Very truly yours,

L. O. DelGeorge
L. O. DelGeorge

Director of Nuclear Licensing

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cc: Region III Inspector - Dresden

SUBSCRIBED and SWORN to
before me this 18th day
of August, 1982

Rosalie A. Puente
Notary Public

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Commonwealth Edison Company

Attachment A
Response to Notice of Violation

The item of non-compliance identified in Appendix A of the NRC letter, dated July 19, 1982, is responded to in the following paragraphs:

10 CFR 50, Appendix B, Criterion II states, in part, "The applicant shall establish . . . a quality assurance program . . . This program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures, or instruction."

Commonwealth Edison Quality Assurance Manual, Quality Requirement 2.0, Section 2.2 Policy states, "Also, Commonwealth Edison commits to comply . . . with the Regulatory position of the following Regulatory Guides . . ." "Dresden, Quad-Cities, and Zion Nuclear Power Stations. . .1.33 (Safety Guide 33 - November 1972)."

Safety Guide 33 - November 1972, Appendix A, Section I.5 requires General Procedures for the control of maintenance, repair, replacement, and modification work. Sub Item b. requires that factors be taken into account in preparing detailed work procedures including the necessity for minimizing radiation exposure to workmen. Section J states, "Chemical and radiochemical control procedures should be written to prescribe the nature and frequency of sampling and analysis, instructions maintaining water quality within prescribed limits and limitations on concentrations of agents that may cause corrosive attack of fouling of heat transfer surfaces, or that may become sources of radiation hazards due to activation.

Dresden Administrative Procedure DAP 3-7 "General Use Hose Identification" specifies appropriate uses for hoses in the plant by color codes and if it is contaminated or uncontaminated as follows:

Green hoses - Air or Water - Clean inside and outside
Red hoses - Air only - Contaminated outside (clean inside)
Black hoses - Water only - Contaminated outside and inside

Contrary to the above, on several plant tours throughout the inspection period, the Senior Resident Inspector identified numerous instances where hoses were left or in use without regard for the color code that could result in contaminating a clean system or could have resulted in an individual using a hose with internal contamination for a supplied air breathing system. Examples are: on May 11, 1982, red and black hoses lying open on the noncontaminated Unit 2/3 refuel floor; on May 19, 1982, two red hoses on the Unit 2/3 refuel floor being used for contaminated demineralized water; and on May 27, 1982, a combination of green and black hoses connected together being used for service air.

Discussion

Because of the number of work groups which routinely use the various hoses in the performance of their work activities, it has been difficult to maintain complete compliance. In order to increase awareness of the NRC's concerns in this area,, the following actions are being planned.

There will be a renewed effort to identify occurrences and make immediate corrective action. This will be accomplished by increased inspection tours made by station personnel. In addition, a station memorandum will be issued to ensure that all work groups are aware of the concerns and requirements for use of hoses within the plant.

Corrective Action Taken and To Be Taken to Avoid Further Noncompliance and Date When Full Compliance Will Be Achieved

We believe that the actions stated in the above discussion will achieve better compliance with the requirements for use of hoses within the station. As an additional measure, we are continuing our investigation of hardware fixes which would prevent the inappropriate use of hoses within the plant. This investigation is expected to be completed by October 1, 1982, with any required modifications as a result of that investigation being completed by February 1, 1982.

The station memorandum to increase awareness of the concerns and requirements for hose use will be issued by October 1, 1982.