

JUN 20 1994

IE01

Docket Nos. 50-10; 50-237; 50-249  
License Nos. DPR-2; DPR-19; DPR-25

Commonwealth Edison Company  
ATTN: Mr. M. Lyster  
Site Vice President  
Dresden Station  
6500 North Dresden Road  
Morris, IL 60450

Dear Mr. Lyster:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT  
NOS. 10/94008; 237/94008; 249/94008)

This refers to the inspection conducted by M. Leach, C. Phillips, D. Chyu, M. Kunowski, E. Plettner, J. Smith, and T. Taylor of this office, and by C. Settles of the Illinois Department of Nuclear Safety, on April 12 through May 25, 1994. The inspection included a review of activities authorized for your Dresden Nuclear Station, Units 1, 2, and 3, facility. At the conclusion of the inspection, the findings were discussed with Mr. S. Perry and those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violations are of concern because there were multiple examples of inadequate procedures and failure to follow procedures which were identified by the NRC. Good procedural guidance and adherence to procedures are essential to safe operation.

We are also concerned about the inordinately high number of personnel contamination events, a problem that also occurred in 1993 during the Unit 2 refueling outage. To date in 1994, the station has recorded almost 3000 such events. Our review during the current inspection identified a lack of strong upper management focus on this problem. We do not believe that the problem can be solved through the efforts of only your radiation protection and station laborer groups. In addition to your response to the Notice of Violation, please provide us with a description of your plans to address this problem and a schedule of expected completion dates.

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During this inspection, certain other of your activities appeared to be in violation of NRC requirements. The non-cited violation described in paragraph 4.c of the enclosed inspection report was categorized as Severity Level V and is not being cited because the criteria specified in Section VII.B.1 of the "General Statement of Policy and Procedures for NRC Enforcement Actions," (Enforcement Policy, 10 CFR Part 2, Appendix C), were satisfied.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Sincerely,

*Original Signed by  
John Qualinski*

E. G. Greenman, Director  
Division of Reactor Projects

Enclosures:

1. Notice of Violation
2. Inspection Reports
  - No. 50-10/94008(DRP)
  - No. 50-237/94008(DRP)
  - No. 50-249/94008(DRP)

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