October 28, 1999

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: NRC RADIATION PROTECTION INSPECTION REPORT 50-237/99019(DRS); 50-249/99019(DRS)

Dear Mr. Kingsley:

On October 8, 1999, the NRC completed a routine inspection at the Dresden Generating Station, Units 2 and 3. The enclosed report summarizes the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Specifically, the inspection focused on the implementation of the radiation protection program during the early stages of the Unit 2 refueling outage (D2R16) and included a review of outage radiological planning and dose management, implementation of the as-low-as-is-reasonably-achievable (ALARA) program, the control and oversight of radiological work, radiation worker performance and source term reduction initiatives. An incident involving an unplanned intake of radioactive material that occurred prior to the outage and a problem with the renewal of your quality assurance program for use of certain radioactive material packages were also reviewed. Within these areas, the inspection consisted of selective examinations of procedures and representative records, observations, independent measurements and interviews with station and contractor personnel.

Overall, the radiation protection program was generally implemented effectively during the initial week of the planned 24-day outage. In particular, ALARA initiatives, radiological work oversight and aggressive dose management practices were instrumental in maintaining outage dose reasonably low. We concluded that efforts to prevent intakes of radioactive material and limit personnel contamination events were generally successful and that radiation worker and radiation protection staff performance was consistent with recent good outage performance. However, outage dose goals were challenged by expansions in work scope, some problems with drywell in-service-inspection activities, and with excessive work crew size and contractor work force inexperience. We also noted deficiencies in an apparent cause evaluation (ACE) recently completed for the unplanned intake incident that occurred prior to the outage.

Based on the results of this inspection, a violation was identified for conducting radioactive material shipment activities under the General License provisions of Subpart C of 10 CFR Part 71 with an expired quality assurance program for radioactive material packages. Although

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the violation was identified by the NRC, it is being treated as a Non-Cited Violation (NCV) consistent with Appendix C of the Enforcement Policy.

The NCV is described in the subject inspection report. If you contest the violation or the severity level of this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, Region 3, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 2.790 of the Commissions regulations, a copy of this letter, its enclosure, and your response to this letter, if you choose to respond, will be placed in the NRC Public document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Sign By Gary L. Shear

Gary L. Shear, Chief
Plant Support Branch

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

Enclosure: Inspection Report 50-237/99019(DRS); 50-249/99019(DRS)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services
C. Crane, Senior Vice President, Nuclear Operations
H. Stanley, Vice President, Nuclear Operations
R. Krich, Vice President, Regulatory Services
DCD - Licensing
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