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DUB

May 20, 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: Dresden Station Units 2 and 3
Response to I.E. Inspection Report
Nos. 50-237/83-08 and 50-249/83-07
NRC Docket Nos. 50-237 and 50-249

Reference (a): J. A. Hind letter to Cordell Reed
dated April 22, 1983.

Dear Mr. Keppler:

Reference (a) transmitted the results of an inspection conducted by Messrs. R. Paul and P. Lovendale on February 22-25, and March 1, 9 and 14, 1983, of activities at Dresden Nuclear Power Station, Unit 2 and 3. During the course of that inspection, two items were identified as being in noncompliance with NRC requirements. Attachment A to this letter contains our response these items of noncompliance. Also included in Attachment A is our response on final corrective actions to be taken to ensure adequate access controls of high radiation areas, which was an identified item of noncompliance in I.E. Inspection Report No. 50-249/81-30, NRC Docket No. 50-237.

If you have any questions regarding this matter please contact this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - Dresden

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ATTACHMENT A

Commonwealth Edison Company Response to Notice of Violation

The items of non-compliance identified in the Appendix of the NRC letter dated April 22, 1983, are responded to in the following paragraphs:

1. Technical Specification 6.3.B requires that radiation control procedures be maintained, made available to all personnel, and adhered to.
 - a. The Dresden Station Radiation Control Standards require that individuals using respirators which require a facial seal for effectiveness must not wear protective apparel which interferes with the sealing surface of the respirator.

Contrary to the above, on February 23 and 24, 1983, workers were observed wearing full-face respirators with hoods or surgeon's caps worn such that a portion of the cap was between the sealing surface of the respirator and the face.

Corrective Action Taken and the Results Achieved

In order to address the situation, Radiation Protection management personnel increased their surveillance of in-plant radiation work activities. The purpose of the increased surveillance was to ensure that the proper radiation protection practices with respect to wearing of respiratory devices were being followed.

Further, an additional RCT was positioned at the entrance to the drywell area. Among his assigned duties, this individual was instructed to be cognizant of the proper application of radiological protective equipment by workers entering the drywell.

Corrective Action to be Taken to Avoid Further Non-Compliance and Date of Full Compliance

The Commonwealth Edison Company Radiation Protection Standards provides guidelines for radiation protection training of personnel working at CECO nuclear facilities. Included in these guidelines is a discussion of the extent of training required for those individuals using respiratory protective devices at a nuclear facility. A review of the current respiratory training program administered at Dresden Station revealed that the program does adequately address the issue of how to properly wear a respiratory device. Specifically, the video tape presentation provides an example of an individual donning an air-purifying device while correctly avoiding any interference with the sealing surface from hair or protective apparel.

To reinforce this requirement, the following steps will be taken:

1. A letter to each department head, including the site Station Construction Department, will be issued from the Rad/Chem Supervisor describing this incident and restating the Radiation Protection Standards requirements for wearing respiratory apparel. Each department head will be required to discuss this program with the members of his department. The letter and the subsequent discussions will be completed by July 31, 1983.
 2. The Rad/Chem Department will be specifically instructed to monitor that personnel are properly wearing respiratory protective equipment. This item will be completed by June 30, 1983.
- b. The Dresden Station Radiation Control Standards require that radiation protection instructions be observed upon exiting controlled areas and that contaminated materials be contained to minimize the possibility of spreading contamination to uncontrolled areas.

Contrary to the above, (1) workers were observed exiting the Unit 2 torus and drywell areas without frisking, although step-off pad instructions specified that frisking was required; (2) two workers who had alarmed the Unit 2 trackway portal monitor proceeded to the RCT foreman's area, although posted instructions specified that they call for RCT assistance, and (3) neither the two workers, nor the RCT foreman took appropriate measures to minimize the spread of contamination to uncontrolled areas by the two workers.

Corrective Action Taken and the Results Achieved

In an effort to ensure that good health physics practices at the drywell area were observed, particularly with respect to contamination detection, an additional RCT was stationed at the entrance to the area. By placing the RCT at this strategic point, significant improvements in both the proper removal of radiological protective clothing and in the use of frisking devices were observed by Radiation Protection management personnel.

The incident concerning the workers who had alarmed the Unit 2 trackway portal monitor and proceeded to the RCT foreman's area without calling for assistance and the associated problem of not adequately preventing the spread of contamination were discussed with the Radiation Protection foreman involved. Proper response in similar situations was discussed with the foreman.

Corrective Action to be Taken to Avoid Further Non-Compliance and Date of Full Compliance

Individual workers at Dresden are instructed in the function and use of the contamination detection devices during the NGET Radiation Protection Training Program. It is a requirement to use the instrumentation

as specified by the Radiation Protection Department throughout the Station. Further, instruction is provided concerning proper steps to allow in the event that monitors alarm so that the likelihood of spreading contamination is minimized. Occurrences of personnel contamination are periodically monitored by Radiation Protection management to identify problem areas and initiate corrective actions as appropriate.

In order to re-inforce the station program for contamination controls as outlined above, the following steps will be taken:

1. The Dresden site-specific portion of the NGET program for nuclear plant workers will be revised to further emphasize the importance of adherence to posted instructions at portal monitor locations. The revisions will be completed prior to the initiation of the Dresden Station annual requalification program, currently scheduled for September, 1983.
2. A review of the major access control points to controlled areas will be conducted to ensure that adequate instructions are posted at each area and that appropriate supplies are available for use by the individual in minimizing the spread of contamination. This review will be completed by June 30, 1983.
3. The subject of minimizing the spread of contamination will be a topic for discussion during this year's RCT re-training program. Both RCT's and the Rad Protection Foremen are required to attend these five-day sessions. The re-training program is expected to be completed by October 31, 1983.

Previous Item of Non-Compliance

During a previous inspection (Inspection Report No. 50-249/81-30) an item of non-compliance was issued concerning failure to control access to a high radiation area.

Final Corrective Action to be Taken to Avoid Further Non-Compliance and Date of Full Compliance

As discussed with the inspectors during the course of the inspection, the primary method for controlling access to high radiation areas consists of a program of locked entrances with a system for maintaining positive control over each entry. This program, which we believe is in compliance with 10 CFR Part 20, is specified in Dresden Administrative Procedure (DAP) 12-4, "Control of High Radiation Areas". Further procedural guidance is provided in the Commonwealth Edison Company Radiation Protection Standards, in the section entitled, "Work in Controlled Areas". Included in this section of the Standards is a discussion of those requirements which must be obtained by the individual from the Rad/Chem group prior to entering controlled areas. The purpose of this part of the standards is to ensure that the worker is cognizant of the dose rates and other radiological conditions and requirements pertinent to the job he is to perform.

For certain high radiation areas, it is recognized that special controls need to be implemented. An example of such an area is the drywell, which is posted and controlled at the entrance as a high radiation area. Due to the varying radiological conditions present in the drywell, and consistent with the discussion held between members of your staff and representatives of Commonwealth Edison Company on March 9, 1983, additional controls were implemented prior to the completion of the Unit 2 outage this year for the drywell area. The additional controls focused primarily on stationing an RCT at the entrance to the drywell area. The functions of the RCT included ensuring that each individual entering the area was cognizant of the radiological conditions for the work location, ensuring that adequate dosimetry had been provided, and, where required, ensuring that the RWP paperwork associated with the job had been completed. Drywell controls also consisted of a program of on-the-job surveillance and routine surveys of each elevation. It is our intention to continue this program during future outage periods, and to document the duties of the "Drywell RCT" via an administrative procedure. This procedure, together with the requisite training of Rad/Chem personnel, will be completed prior to the Unit 3 outage, currently scheduled for October, 1983.