



Commonwealth Edison

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DMB

April 8, 1985

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 1, 2 and 3
Response to Inspection Report Nos.
50-010/84-20, 50-237/84-26 & 50-249/84-23
NRC Docket Nos. 50-010, 50-237 and 50-249

Reference (a): C. E. Norelius letter to Cordell Reed
dated February 28, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. T. M. Tongue, S. Stasek and C. D. Anderson during the period of December 21, 1984 through February 15, 1985, of activities at Dresden Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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cc: NRC Resident Inspector - Dresden

Attachment

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

ITEM OF NONCOMPLIANCE

The Commonwealth Edison Company Quality Assurance Manual Section 16 addresses corrective actions. Quality Procedure 16-51, Corrective Action for Operations - Corrective Action System, specifically addresses the mechanism available to CECO personnel to assure timely follow-up on important items such as audit deficiencies.

Contrary to the above, no formal mechanism was utilized to track the self-identified possible deficiency to ensure a timely review and resolution.

DISCUSSION

In May 1983, CECO personnel identified a potential discrepancy involving the 10 CFR 50.59 evaluation format utilized in the CECO QA Manual. The potential discrepancy was eventually determined not to be a problem. Adequate procedural controls existed both at Station Nuclear Engineering Department and Dresden to identify potential Technical Specification changes required for plant modifications. Thus, no change was required to the CECO 10 CFR 50.59 review process.

An NRC Inspector in February 1985 inquired as to the resolution of this matter. Although no corrective action was required on CECO's part, a substantial period of time (21 months) has elapsed between identification of the potential discrepancy and the NRC follow-up with no CECO documented evaluation of the matter. This excess time to follow-up was considered a non-compliance to 10 CFR 50, Appendix B, Criterion XVI. During this time period several conversations were held between the station and SNED and site Quality Assurance listed this item as requiring follow-up but no written evaluation was produced.

CORRECTIVE ACTIONS TAKEN & RESULTS ACHIEVED

A review was performed by Dresden Station to determine if the event was an isolated one. No other similar instances were identified and it is our belief that the corrective action noted below should preclude recurrence.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Dresden will add to its existing commitment list station generated Action Item Records (QP 16-51), QA commitments, open NRC non-compliances and open items requiring station followup. This list is presently being converted from a work processing based list to a computer based list to facilitate selective sorting on any of numerous topics or dates (e.g., NRC commitments, QA commitments, Action Item Records, due dates, etc.). By placing important commitments and followup required items on the computer, periodic updates and reviews for timely implementation should eliminate, the possibility of untimely responses. The present list is updated and distributed on a monthly basis.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The commitment list is already in existence. Action Item Records (QP 16-51), Dresden QA commitments and Dresden NRC follow-up items (e.g., open non-compliances and open items) will be added to this list by June 1, 1985.