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March 13, 2001

SUBJECT: APPROVAL OF PROPOSED REVISION 67a TO COMMONWEALTH EDISON
COMPANY QUALITY ASSURANCE TOPICAL REPORT (QATR), CE-1-A, (TAC
NOS.: MB0039, MB0040, MB0041, MB0042, MB0043, MB0044, MB0050,
MB0051, MB0059, MB0060, MB0063, MB0064, AND MB0153)

Dear Mr. Kingsley:

On September 21, 2000, Commonwealth Edison Company (ComEd) transmitted proposed Revision 67a of the Quality Assurance Topical Report (QATR), CE-1-A, for Nuclear Regulatory Commission (NRC) review and approval in accordance with 10 CFR 50.54(a)(4). The submittal was supplemented on November 17, 2000. In its proposed Revision 67a, ComEd described six categories of changes. These changes were identified as reductions in commitment in the QATR and thus subject to NRC approval pursuant to 10 CFR 50.54(a)(4). Subsequent to the date of the submittal, ComEd was merged into Exelon Generation Company, LLC (Exelon). By letter dated February 7, 2001, Exelon informed the NRC that it has assumed responsibility for all pending NRC actions that were requested by ComEd.

The enclosed safety evaluation documents the bases for our conclusion that the reductions in commitment identified by Exelon in Revision 67a to the QATR are consistent with the guidance in NUREG-0800, "Standard Review Plan," and, therefore, the QATR continues to satisfy the requirements of 10 CFR 50.36(c)(5), and of Appendix B to 10 CFR Part 50.

Sincerely,

/RA/

George F. Dick, Sr., Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,
STN 50-456, STN 50-457, 50-010,
50-237, 50-249, 50-373, 50-374,
50-254, 50-265, 50-295, 50-304

Enclosure: As stated

cc w/encl: See next page

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The enclosed safety evaluation documents the bases for our conclusion that the reductions in commitment identified by Exelon in Revision 67a to the QATR are consistent with the guidance in NUREG-0800, "Standard Review Plan," and, therefore, the QATR continues to satisfy the requirements of 10 CFR 50.36(c)(5), and of Appendix B to 10 CFR Part 50.

Sincerely,

/RA/

George F. Dick, Sr., Project Manager, Section 2
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Enclosure: As stated

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

EXELON GENERATION COMPANY, LLC

QUALITY ASSURANCE TOPICAL REPORT, REVISION 67a

BRAIDWOOD STATION, UNITS 1 AND 2

BYRON STATION, UNITS 1 AND 2

DRESDEN NUCLEAR POWER STATION, UNITS 1, 2, AND 3

LASALLE COUNTY STATION, UNITS 1 AND 2

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

ZION NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. STN 50-456, STN 50-457, STN 50-454, STN 50-455, 50-10,

50-237, 50-249, 50-373, 50-374, 50-254, 50-265, 50-295 AND 50-304

1.0 INTRODUCTION

On September 21, 2000, Commonwealth Edison Company (ComEd, the licensee) transmitted proposed Revision 67a of the Quality Assurance Topical Report (QATR), CE-1-A, for Nuclear Regulatory Commission (NRC) review and approval in accordance with 10 CFR 50.54(a)(4). The submittal was supplemented on November 17, 2000. In its proposed Revision 67a, the licensee described six categories of changes. These changes were identified by the licensee as a reduction in commitment in the QATR, and thus subject to NRC approval pursuant to 10 CFR 50.54(a)(4). Subsequent to the date of the submittal, ComEd was merged into Exelon Generation Company, LLC (Exelon). By letter dated February 7, 2001, Exelon informed the NRC that it has assumed responsibility for all pending NRC actions that were requested by ComEd.

2.0 EVALUATION

2.1 Construction Phase Removal

- 2.1.1 Description of Change: The licensee removed the construction phase-related references and limited the QATR to the operational phase only, including maintenance, modification, repairs, and decommissioning. The modified items are located in Section 1, 2, 9, 11, and 14 of the QATR.

- 2.1.2 Evaluation of Change: Currently, the Licensee's QATR covers all nuclear activities including the construction of new plants. The licensee does not have any nuclear power plants under construction and removed all of the construction phase-related requirements to permit the licensee to focus on the operations related controls. The licensee states, "If a new plant is to be constructed an addendum to this program [QATR], or a new program will be prepared." No requirements applicable to the operations phase have been reduced or modified. On this basis, the removal of the construction phase-related requirements is consistent with Section 17.2, "Operations," of the NUREG-0800, the "Standard Review Plan" (SRP) and the QATR continues to comply with Appendix B of 10 CFR Part 50 requirements.

2.2 Plant Review Functions

Section 13.4, "Operational Review," of the SRP, provides the acceptance criteria used by the staff to evaluate provisions related to administrative controls. This acceptance criteria is based on meeting the relevant requirements of 10 CFR 50.40(b) as it relates to the licensee being technically qualified to engage in licensed activities. Appendix B to 10 CFR Part 50 referenced in SRP Section 17.2, Quality Assurance during the Operations Phase relates to the review and audit functions required by the licensee's quality assurance program.

2.2.1 Nuclear Safety Review Board

- 2.2.1.1 Description of Change: The licensee revised and relocated Section 20A, "Nuclear Safety Review Boards (NSRB)" to Section 1, "Organization," subsection 2.4.3, "Nuclear Safety Review Boards (NSRBs)" of the QATR. The revision changed (a) the qualifications of the NSRB Chairperson, (b) the responsibilities of the NSRB Chairperson, (c) the NSRB quorum commitments, and (d) the commitments to review the NSRB.
- 2.2.1.2 Evaluation of Change: The revised qualifications of the NSRB Chairperson are consistent with ANSI/ANS 3.1-1981, Section 4.7.1 commitments for Chairman of Standing Committee Responsible for Independent Review. The licensee still maintains the commitment of the NSRB Chairperson to require independent oversight relative to nuclear safety. The revised quorum commitments of the NSRB are consistent with ANSI/ANS 18.7-1976/ANS-3.2, Section 4.3.2.3 "Quorum."

2.2.2 Plant Review Functions

- 2.2.2.1 Description of Change: The licensee revised and relocated Section 20B, "Plant Review Functions," to Section 1, "Organization" of the QATR. The revision changed (a) the amount of alternates allowed to vote on the Plant Operations Review Committee (PORC) and (b) the quorum commitments for the PORC.
- 2.2.2.2 Evaluation of Change: The revised commitment concerning the amount of alternates allowed to vote and the quorum commitments for the PORC are consistent with the SRP 13.4, Section II.1.b.

Based on the above, the changes proposed by the licensee continue to satisfy the acceptance criteria set forth in Section 13.4 of the SRP. The licensee continues to comply with the relevant requirements of 10 CFR 50.36(c)(5) and of Appendix B to 10 CFR Part 50.

2.3 Permanently Defueled Plant Reviews

- 2.3.1 Description of Change: The licensee deleted the onsite/offsite reviews for Zion Nuclear Power Station (ZNPS) from the QATR and revised the onsite/offsite reviews for Dresden Nuclear Power Station (DNPS) Unit 1. The review functions for ZNPS are described in their Permanently Defueled Technical Specifications (PDTs) Section 5.0, "Administrative Controls," subsection 5.9, "Reviews." The onsite review function for DNPS Unit 1, has been revised to read the same as described in Section 5.9.1, "Qualified Technical Review," of the ZNPS PDTs, and relocated to the new QATR subsection 2.6.3 in Section 1. The independent review function for DNPS Unit 1 will now be performed by the NSRB.
- 2.3.2 Evaluation of Change: On December 30, 1999, the NRC approved amendments No. 180 and No. 167 to the Facility Operating Licenses for ZNPS Units 1 and 2 respectively. The amendments replaced the custom Technical Specifications with the PDTs. Section 5.9 of the PDTs and Section 1.2 of the QATR establish the requirements for technical reviews and safety reviews, as follows:
 - a. PDTs Section 5.9.1 describes the commitments for onsite reviews which are consistent with SRP 13.4, Section II.1.a, b, c, & d and ANSI N18.7-1976/ANS-3.2, Section 4.4.
 - b. PDTs Section 5.9.2 describes the commitments for independent reviews which are consistent with SRP 13.4, Section II.2 and ANSI N18.7-1976/ANS-3.2, Section 4.3.

- c. QATR Section 1.2.6.3 describes the commitments for onsite reviews which are consistent with SRP 13.4, Section II.1.a, b, c, & d and ANSI N18.7-1976/ANS-3.2, Section 4.4.
- d. QATR Section 1.2.4.3 describes the commitments for independent reviews which are consistent with SRP 13.4, Section II.2 and ANSI N18.7-1976/ANS-3.2, Section 4.3.

On this basis, the changes proposed by the licensee continues to satisfy the acceptance criteria set forth in Section 13.4 of the SRP and have no impact on the licensee's compliance with the relevant requirements of 10 CFR 50.36(c)(5), and of Appendix B to 10 CFR Part 50 for a decommissioning status facility.

2.4 ASME Code "N" Certificate of Authorization

- 2.4.1 Description of Change: The licensee revised Section 1.3.2, Section 2.3.6, Section 7.3.6.2, Section 12.3.6, Section 18.3.1.2, and Section 18.3.2 of the QATR. These revisions deleted QATR provisions necessary for the licensee to maintain its ASME Code "N" certificate of authorization.
- 2.4.2 Evaluation of Change: The licensee did not renew its ASME Code "N" certificate of authorization when it expired in January 1997. The QATR commitments that assumed that an ASME Code "N" certificate of authorization would be maintained by the licensee are no longer relevant and may be deleted. This deletion is acceptable since it does not impact the licensee's continued compliance with Appendix B of 10 CFR Part 50 requirements.

2.5 Audit Frequency

- 2.5.1 Description of Change: The licensee revised Section 18.3.2, "Independent Management Audit/Assessment" of the QATR. The revision changed the periodic audit frequency from annually to not exceeding 24 months.
- 2.5.2 Evaluation of Change: The revised audit frequency commitment is consistent with ANSI N18.7-1976/ANS-3.2. Therefore, it complies with Appendix B of 10 CFR Part 50 requirements and is acceptable.

3.0 CONCLUSION

While the proposed Revision 67a to the licensee's QATR, dated September 21, 2000, as supplemented on November 17, 2000, constitutes a reduction in commitments in the QA program description previously approved by the NRC, the staff has determined that the changes described continue to satisfy the acceptance criteria set forth in Sections 13.4 and 17.2 of the SRP. The licensee continues to comply with the relevant requirements of 10 CFR 50.36(c)(5), and of Appendix B to 10 CFR Part 50. Therefore, the changes proposed in revision 67a of the QATR are acceptable.

Principal Contributor: M. Bugg

Date: March 13, 2001