



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

May 13, 1991

Mr. A. Bert Davis  
Regional Administration  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Commonwealth Edison Company  
Nuclear Quality Program  
Department Technical Specification  
Audit Technique  
NRC Docket No. 50-456/457, 454/455, 237/249,  
373/374, 254/265 and 295/304

Mr. Davis:

The purpose of this letter is to document and inform you and your staff of a change in the performance of Technical Specification audits which are conducted by Commonwealth Edison's Nuclear Quality Programs (NQP).

Previously, the station NQP group was required to audit each "line item" of the Technical Specifications within a five-year (for Dresden, Quad Cities and Zion) or eight-year (for Byron, Braidwood and LaSalle) period. The requirement for the Nuclear Quality Programs Department "line item" Technical Specification audit is believed to have originated from a verbal commitment that was made during the Byron Station "Ready for Operation" inspection. Each NQP site group tracked the verification of the Technical Specification "line items" through the use of a matrix to assure that each item is audited within the required time period.

In an effort to further improve the effectiveness of the audit and surveillance function of the NQP Department, Commonwealth Edison has shifted from the rigid compliance auditing techniques to performance-based auditing. The performance-based auditing philosophy requires an increased emphasis on the observation of ongoing facility activities and less emphasis on document review as the primary focus of the audit. As a result, NQP resources now concentrate on activities which have the greatest effect on facility reliability and safety rather than devoting resources to activities which have little impact upon improved plant performance. In order to implement this philosophy, Commonwealth Edison has reviewed the activities which are currently performed by the NQP groups to ensure these activities are consistent with this philosophy.

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Commonwealth Edison has concluded that the Technical Specification "line item" audit is counterproductive to our efforts to implement performance-based auditing. This "line item" requirement resulted in the scope of Technical Specification audits being driven by the tracking matrix rather than station activities; therefore, the audit normally resulted in the traditional document review and verification rather than assuring the quality execution of plant activities related to Technical Specifications.

Commonwealth Edison realizes that to be in compliance with each station's Technical Specification, auditing of the Technical Specifications must continue. NQP site groups will, therefore, perform audits of the station's compliance with Technical Specifications utilizing performance-based techniques. As of January 1, 1991, Nuclear Quality Program Instruction number 4, which requires the use of the Technical Specification matrix, has been deleted. This change in auditing practice has been discussed with Mr. William Forney of your staff.

Very Truly Yours,



T.J. Kovach  
Nuclear Licensing Manager

cc: W. Forney  
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