



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

November 1, 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to NRC Systematic Assessment of Licensee
Performance (SALP) Report 237/91001; 249/91001
NRC Docket Numbers 50-237 and 50-249

Reference: A.B. Davis (NRC) letter to C. Reed (CECo) dated
October 4, 1991

Gentlemen:

Commonwealth Edison (CECo) would like to thank you for meeting with us and presenting the SALP 10 Report on October 31, 1991, as well as affording us the opportunity to provide our views on the SALP results. This letter provides CECo's comments to the report.

We appreciate the NRC's recognition of superior performance in the area of Emergency Preparedness and Security and will continue to achieve in these areas.

CECo acknowledges that recent Dresden performance has resulted in a negative trend. A team has been formed to specifically identify those issues which are negatively impacting station performance. The Dresden Situational Review Team will prepare a report for station management citing those priority issues which underlie station performance weaknesses including a status of current corrective actions addressing those weaknesses and/or potential new solutions. The action plans resulting from this effort will feed into the Dresden Management Action Plan (DMAP). DMAP is a corrective and improvement action plan tracking program which allows better management and control of priority action plans and measurement of the effectiveness of those plans. The current DMAP is being upgraded to be similar to the Zion MAP. This effort of an independent review is intended to validate, and modify as necessary, the improvements underway at Dresden, as well as providing an improved control and reporting system.

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We would like to underscore the fact that significant work has been ongoing and we are confident of near term performance improvement. Following are some of the key actions already implemented.

Operating management oversight of complex plant evolutions has been increased through implementation of the Heightened Level of Awareness Program. Operating shift management has been increased during the current Unit 3 refueling outage by adding a second SRO to the control room day shift to control ongoing maintenance activities. This additional SRO has relieved the Shift Control Room Engineer of excessive administrative duties created by the outage and allows closer oversight of all control room activities. Additionally, Shift Engineers are currently observing activities of other operating crews. Observations are documented, reviewed by operations management, with actions taken as appropriate. Procedural adherence expectations have also been reinforced to all operating personnel through a recently issued policy statement. Finally, an Operations Improvement Team was formed and is focusing on developing internally generated approaches to improved performance.

Actions to reduce the high collective and individual radiation exposures are ongoing. These include a priority-based system for source term reduction, a review of equipment histories to identify repetitive failures resulting in high dose and development of methods to eliminate unnecessary repair, and enhancements to the ALARA history files to improve job dose estimates.

Additionally, first line supervision has been increased for the current Unit 3 refuel outage by temporarily assigning experienced maintenance personnel from other departments. This will allow maintenance foremen to provide additional on-the-job oversight by spending more time in the field. Work package improvements have been implemented related to "user friendliness" of the package and to promote adherence to procedures. These improvements were identified by a committee comprised of both management and bargaining unit personnel from all maintenance disciplines. A work analyst guideline has been developed to ensure consistent and thorough work package preparation by all work analysts. Additionally, committees have been formed focusing on work control, tools improvement, professionalism and intradepartmental relationships; these committees have been in place for several months.

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Numerous design upgrades are in process or are being planned. These include additional diesel generators, reactor water cleanup piping replacement and hardened vents.

CECo recognizes the importance of timely, effective technical issues resolution. In October 1990, Corporate Engineering implemented procedure ENC QE 40.1, 'Evaluation and Review of Potential Design Concerns for Impact on Plant Operability', to improve responsiveness to issues similar to the degraded voltage issue. It is currently being revised to incorporate lessons learned during it's first year of use and NRC feedback. Staffing has been a major focus for 1991 resulting in a modest reduction in outstanding engineering tasks. The current experience level and future needs of the site engineering staff are being reviewed and adjustments will be made as necessary. CECo has initiated comprehensive programs in the area of Engineering and Technical Support to increase retrievability of plant design specifications, industry design codes and safety system requirements. In addition, we are improving the quality of design calculations by establishing a technical requirements document providing expectations for quality calculations.

Organizational changes have been recently implemented for the Corporate Operations area. Specifically, the role of the General Managers reporting to the Vice Presidents for Operations will be expanded to ensure consistent implementation of policy decisions among the CECo nuclear stations. The General Managers will assume line management responsibility for their assigned functional groups including operations, maintenance, and work planning. This should provide more effective corporate oversight of and support for station activities.

We look forward to the scheduled November 12, 1991, meeting when we will be able to discuss the issues in more detail. Should you have any questions, contact Rita Radtke, Compliance Engineer, 708-515-7284.



T. J. Kovach
Nuclear Licensing Manager

cc: A. B. Davis Regional Administrator - RIII
W. G. Rogers, Senior Resident Inspector - Dresden
B. L. Siegel, Project Manager, NRR