



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

October 5, 1992

Dr. Thomas E. Murley, Director  
Office Of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2  
Braidwood Station Units 1 and 2  
Dresden Station Units 2 and 3  
LaSalle County Station Units 1 and 2  
Quad Cities Station Units 1 and 2  
Zion Station Units 1 and 2  
Amendments to Facility  
Operating License DPR-19, DPR-25, DPR-29,  
DPR-30, DPR-39, DPR-48, NPF-11, NPF-18, NPF-37, NPF-66,  
NPF-72 and NPF-77 Approving the Technical Review Function  
NRC Docket Nos. 50-237, 50-249, 50-254,  
50-265, 50-295, 50-304, 50-373, 50-374,  
50-454, 50-455, 50-456, and 50-457

- References:
- a) T. Simpkin letter to Dr. T. Murley dated May 7, 1992.
  - b) T. Simpkin letter to Dr. T. Murley dated July 1, 1992.
  - c) B. Siegel letter to T. Kovach dated July 24, 1992.
  - d) B. Siegel letter to T. Kovach dated September 4, 1992.

Dear Dr. Murley:

In reference a) Commonwealth Edison (CECo) proposed to amend the Technical Specifications for all twelve CECo operating units. The proposed amendment changed the Administrative Controls section to standardize the Onsite Review Function and implement a Technical Review and Control Function to facilitate the procedure revision process. Reference b) supplemented the original request with the information necessary for the staff to complete its review. With reference c), the NRC approved the request for the Dresden and Quad Cities Stations. Reference d) provided the NRC approval for the remaining four CECo stations.

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The purpose of this letter is to document a clarification provided by Mr. B. Siegel of your staff in a telephone conversation with the undersigned held on September 24, 1992. The teleconference was conducted in order to ensure that both the NRC and CECo had a common understanding of the provisions of the Safety Evaluation Report issued with the subject amendments.

CECo's submittal proposed that the involvement of the Onsite Review Function in the procedure change process be limited to the applicable Administrative Procedures referenced in Regulatory Guide 1.33, the Emergency Operating Procedures (EOPs) and those procedures that involve an unreviewed safety question (USQ). A procedure or procedure change is deemed to involve an USQ if the procedure/change fails the test prescribed in 10CFR 50.59 (a)(2).

Those procedures/changes that pass the test prescribed by 10CFR50.59(a)(2) will be reviewed and approved by the Technical Review Function.

It is CECo's understanding that the NRC concurs with this review methodology.

An additional clarification was provided regarding what constitutes a "safety related" procedure. It is CECo's understanding that those procedures recommended by Regulatory Guide 1.33 are considered "safety related" procedures, and those station procedures that fall outside the scope of Regulatory Guide 1.33 are not considered "safety related" procedures.

All station procedures, with the exception of the EOPs and the applicable Administrative Procedures recommended by Regulatory Guide 1.33, will be reviewed and approved by the Technical Review Function if no USQ results from the procedure/change. Those procedures involving an USQ will be referred to the Onsite Review Function for disposition.

Please direct any questions regarding this matter to this office.

Respectfully,

  
Terrence W. Simpkin

Nuclear Licensing Administrator

cc: B. Siegel, Project Manager - NRR  
Resident Inspector - All Stations (6)  
Document Control Desk - NRR  
Region III Office  
Office of Nuclear Facility Safety - IDNS