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Docket No. 50-237; Docket No. 50-249
Docket No. 50-454; Docket No. 50-455
Docket No. 50-456; Docket No. 50-457
Docket No. 50-373; Docket No. 50-374
Docket No. 50-254; Docket No. 50-265
Docket No. 50-295; Docket No. 50-304

Commonwealth Edison Company
ATTN: Mr. L. O. DelGeorge, Vice President
Nuclear Oversight and
Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 300
Downers Grove, IL 60515

Dear Mr. DelGeorge:

We have completed our review of your 10 CFR 50.54(a) submittal dated March 25, 1993, of your Quality Assurance Program Topical Report CE-1-A, Revision 63. Standard Review Plan (SRP) 17.2 of NUREG 0800 was used to evaluate the Topical Report's conformance with NRC regulations. In addition, your document which cross references the Topical Report to the SRP requirements was useful in evaluating how the Topical Report conformed to the SRP. Questions concerning the Topical Report were discussed between Mr. Fred Maura of my staff and Mr. D. Brown and others of your staff on May 19, 25, and 26, 1993.

In approving this major revision to your quality assurance program, I would like to reemphasize the importance of the audit and oversight function performed by your quality assurance organization. This function is vital in that it provides a direct and independent means for senior management to obtain information on the performance of line organizations. In this regard, we note that, in your recent Corporate reorganization, you reduced significantly the number of staff devoted to this function. We understand you consider this reduction to be appropriate and possible through efficiencies gained by combining functions previously performed by various, separate oversight groups such as QA and your independent safety engineering groups (ISEG).

Coupled with some significant past failures of your quality assurance organization to identify significant weaknesses and problems before they were either self-revealed or identified by NRC or other outside groups, these reductions give rise to some concern. We also have some concerns regarding the technical qualifications of the remaining staff. These concerns were discussed in our conversations on June 4, 1993. We would like to meet with you in the near future to review in more detail how you are deploying your

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quality assurance staff. Given the importance of effective, performance-based auditing, we are interested among other things in (a) the experience and technical qualifications of your QA staff and management, (b) the focus of the audit program, and (c) plans for staffing the audit function. Beyond a meeting, we expect to closely monitor effectiveness of your quality assurance organization on an ongoing basis through each of our inspection activities.

Subject to the clarifications presented in the attachment, we find the proposed Topical Report acceptable.

In accordance with NRC practice as discussed in SRP 17.3, and consistent with previous revisions to your Topical Report, we have accepted the removal of the quality assurance organization from the in-line review and approval functions stated in SRP 17.2. However, we understand you will maintain that in-line function for ASME Code work in the areas of special processes and procurement.

Based on our review, we conclude that these revisions continue to meet the requirements of 10 CFR Part 50, Appendix B, and are acceptable. If there are changes to QA commitments existing in docketed correspondence outside of the Quality Assurance Program Topical Reports, you are obligated to notify this office. Approval of this Topical Report does not constitute relief from requirements listed in the Technical Specifications applicable to any of your nuclear stations. Such conflicts, if they exist, will require a license amendment.

We appreciate your timely submittal of information required by 10 CFR 50.54(a). Please contact Mr. Fred Maura at (708) 790-5696 with any questions you may have regarding this matter.

Sincerely,

Original signed by H. J. Miller (for)

John B. Martin
Regional Administrator

Attachment: As stated

See Attached Distribution

Yes RIII Maura/cg 06/7/93	Yes RIII B. Burgess 06/7/93	Yes RIII Clayton 06/7/93	Yes RIII Ring 06/7/93	RIII T. Martin 06/7/93	RIII Miller 06/7/93	Yes RIII J. Martin 06/7/93
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E. J. Leeds, NRR

M. L. Jordan, RIII

C. D. Pederson, RIII

S. Stasek, SRI, Davis-Besse

B. Clayton, DRP

bcc w/attachment: PUBLIC-IE01

ATTACHMENT

Clarifications To Commonwealth Edison Company

Topical Report Revision 63

1. Sections 1.3.3.1 and 1.3.3.2 will include a sentence requiring the NSSS supplier and the Architect-Engineers to work in accordance with a Commonwealth Edison accepted quality assurance program.
2. Section 2.3.1, third paragraph, will be reworded to include construction and preoperational testing.
3. Section 2.3.1, fifth paragraph, will include 10 CFR 50, Appendix R.
4. Section 3.3, first paragraph, will include the following subjects within the scope of design activities: field engineering; physics; seismic, stress, thermal, hydraulic, and radiation factors; the safety analysis accident scenarios; and accessibility for inservice inspection, maintenance, and repairs.
5. Section 3.5.1, will be corrected to include design verification for changes to previously verified designs.
6. Section 3.6 will include the requirement that plant personnel be made aware of design changes and modifications which may affect the performance of their duties.
7. Section 6.3.3, sixth paragraph, will include Safety Analysis Reports and Topical Reports.
8. Section 10.3.2 will require that the inspection plan specify the accuracy requirements of any measuring and test equipment to be used.
9. Section 13.3.1 will be reworded to ensure that procedures used to clean, handle, storage, package, and ship materials, components, and systems are in accordance with design and procurement documents.
10. Section 17.3.2, first paragraph, and Section 17.3.5 will describe the record types, controls, and provisions for storage and preservation of records.
11. Section 19.4 will list the applicable 10 CFR Part 50 appendices to be A, B, and R.