



Commonwealth Edison
Dresden Nuclear Power Station
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November 10, 1993

MDL LTR 93-0069

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

Subject: Dresden Station Units 2 and 3
Response to the SALP 12 Report,
237/93001;249/93001
NRC Docket Nos. 50-237 and 50-249

Reference: J. B. Martin letter to M. J. Wallace
dated September 30, 1993, transmitting the
Dresden Station SALP 12 Report

Commonwealth Edison (CECo) would like to thank you for meeting with us on October 19, 1993, and affording us the opportunity to discuss the SALP 12 Report. This letter provides our response to the SALP 12 report.

We appreciate your recognition of the progress made at Dresden during the last SALP cycle, and your encouragement with respect to our improvement initiatives. We have identified opportunities for improvement in each of the functional areas and will continue our efforts to enhance the overall site performance.

An essential component of our improvement efforts is a strengthening of our self-assessment activities. Timely, accurate and comprehensive appraisals of our efforts will allow us to reinforce those actions which assist us in our effort to continuously improve.

Effective leadership is critical to the establishment and maintenance of an environment where excellence is constantly pursued. The Nuclear Operating Division of Commonwealth Edison will continue to enhance the unique abilities, skills, and experiences of our employees to nurture leaders. Our leaders at Dresden will provide the catalyst to further create an environment of continuous improvement.

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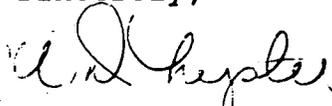
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The Attachment lists some of the initiatives which will be implemented to ameliorate overall performance.

Dresden Station is committed to excellence, and is continually challenging our team to set high standards and work together to meet those standards.

Please direct any comments regarding this response to JoAnn Shields, Regulatory Assurance Supervisor, at (815)942-2920 x2714.

Sincerely,



M. D. Lyster
Site Vice President

cc: J. B. Martin, Regional Administrator - Region III
J. F. Stang, Project Manager - NRR
M. N. Leach, Senior Resident Inspector - Dresden

ATTACHMENT

- * The continued implementation of the site organizational changes will strengthen the site's performance
 - * Site Engineering and Construction
 - * Systems Engineering
 - * Work Control
 - * Long Range Work Control
 - * Site Quality Verification
- * Site Management and Bargaining Unit Leadership will continue to develop a partnership approach to issue resolution.
- * Continued implementation of the Management Overview Process will ensure that expectations are communicated and reinforced.
- * The self-assessment tools used by the site will be improved to be of greater value in our improvement efforts.
 - * Continuous and aggressive encouragement will be given to all employees to initiate Problem Identification Forms (PIFs).
 - * The Integrated Reporting Program (IRP) data trending will be improved.
 - * The Integrated Quality Effort (IQE) Report will be enhanced.
 - * The Dresden Station Oversight Meetings will continue to provide a forum for periodic discussion of our performance.
 - * Preventative trending with regard to equipment problems will be strengthened.
- * Self-check and attention to detail habits will be instilled in the employees
- * Management will reinforce procedure adherence expectations
- * Management will continue to evaluate corrective action effectiveness.

- * Operations Management will become more effective in improving routine operational activities
 - * The Shift Operations Supervisor has been dedicated to coaching and mentoring of crews.
 - * Shift Engineer Review Board has been established to address human performance events.
- * To assist in ensuring the further development of a strong safety focus, the current efforts in upgrading the design basis of the station will continue.
 - * Design Basis Documents
 - * FSAR Rebaseline
 - * Master Equipment List
 - * Technical Specification Upgrade
- * The Top 50 Technical Issues process will continue to focus the technical organization on the needs of the site.
- * We will continue to resolve longstanding equipment problems, and communicate the lessons learned.
- * Materiel condition and housekeeping improvements will continue.
- * Work will continue to resolve program deficiencies
 - * Definition of roles and responsibilities of program/process owners
 - * Quality of Vendor Manuals
 - * Craft training
 - * Procurement and quality of parts
- * Work control efficiencies will continue to be implemented to ensure that the maintenance backlog remains at a manageable level, and that the proper safety focus is maintained.
 - * Process improvements
 - * Root cause analysis expanded
 - * Minor maintenance program development
 - * Minor modification program
 - * Establish a mechanism to measure the effectiveness of work planning implementation
- * Security Department will continue the efforts to maintain the current high level of plant security.
 - * Existing commitments have been reviewed for continued applicability, and appropriate changes will be pursued.
 - * Protection methods are being assessed on a continuous basis for opportunities to improve efficiency.

- * Radiation Protection (RP) individuals have been included in the daily work planning process to assist in reducing personnel exposure.
- * The implementation of an RP outage planning process to track issues related to radiation protection will continue.
 - * Addresses radiological impact and establishes radiological controls and requirements
 - * Reduces emergent work by understanding the full work scope and contingencies
- * Source Term Reduction initiatives are being established.
 - * Evaluation of permanent lead shielding
 - * Formalization of cobalt reduction program
 - * Development of a dose-rate maintenance program
 - * Enhancement of hydrolazing and flushing
- * Contamination control will be improved.
 - * Development of station decontamination plan
 - * Improvement of decontamination activities and release surveys