

April 21, 1994

Docket Nos. STN 50-454, STN 50-455,
STN 50-456, STN 50-457,
50-237, 50-249, 50-373,
50-374, 50-254, 50-265,
50-295, and 50-304

LICENSEE: Commonwealth Edison Company (CECo)

FACILITIES: Byron, Units 1 and 2; Braidwood, Units 1 and 2; Dresden, Units 2
and 3; LaSalle, Units 1 and 2; Quad Cities, Units 1 and 2; and
Zion, Units 1 and 2

SUBJECT: SUMMARY OF APRIL 7, 1994 MEETING

On April 7, 1994, a public meeting was held between the NRC and CECo (the licensee) to discuss CECo's approach for improving their operability assessment process. A list of attendees is enclosed (Enclosure 1).

Enclosure 2 provides a chronology of the discussions. Most of the interest was in reviewing the operability flow model (final two pages of Enclosure 2). Particular points of discussion were: (1) the licensee's rationale for addressing equipment operability in the process before addressing equipment degradation; (2) the key role of the shift engineer in the process.

During the discussion, the NRC staff noted that revision 1 to Generic Letter 91-18, regarding the resolution of degraded and nonconforming conditions and on operability, will not have any significant changes. The intent of the revision is to clarify those portions that, during the application of GL 91-18 may have been confusing, and to address items that were identified during the GL 91-18 workshops.

Original Signed By:

George F. Dick, Jr., Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

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PDR ADDOCK 05000237
P PDR

Enclosures:

1. List of attendees
2. Agenda

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OFC	LA:PDIII-2	PM:PDIII-2	D:PDIII-2			
NAME	CHAWES <i>nmw</i>	GDICK <i>hfd</i>	JDYER <i>gn</i>			
DATE	4/20/94	4/20/94	4/21/94	/ /94	/ /94	/ /94
COPY	(YES/NO)	(YES/NO)	(YES/NO)	YES/NO	YES/NO	YES/NO

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NRC & Local PDRs

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R. Assa

J. Stang

A. Gody, Jr.

C. Patel

C. Shiraki

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E. Jordan

J. Arildsen

J. Beall

C. Grimes

J. Luehman

ACRS (10)

B. Dean 17, G 21

B. Clayton, RIII

E. Greenman, RIII

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NAME	CHAWES <i>cmh</i>	GDICK <i>gdick</i>	JDYER <i>jd</i>			
DATE	4/20/94	4/20/94	4/21/94	/ /94	/ /94	/ /94
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Enclosure 1

LIST OF MEETING ATTENDEES
FOR April 7, 1994

J. Arildsen	NRC/OTSB
J. Beall	NRC/OE
G. Dick	NRC/PD III-2
D. Farrar	CECo/Corporate
A. Gody	NRC/PD III-2
C. Grimes	NRC/OTSB
J. Luehman	NRC/OTSB
A. Misak	CECo/Quad Cities Station
T. O'Reilly	NUS
T. Pendergast	CECo/Corporate
M. Rauckhorst	CECo/Zion Station
S. Stimac	CECo/Corporate
J. Zwolinski	NRC/ADR3

Meeting with NRC to Discuss
Commonwealth Edison Company's
Approach for Improving the Operability Assessment Process

AGENDA

- Background
- Definition of Issues
- Operability Assessment Improvement Action Plan
- Discussion of Revised Process (Flow Chart)
- Feedback

BACKGROUND

- June 1989 - CEC Co Operability Task Force formed
- January 1990 - Nuclear Operations Directive on "Conduct of Operations" revised
- October 1990 - Procedure for Engineering Operability Evaluations (QE-40.1) issued
- November 1991 - Generic Letter 91-18 issued
- January 1992 - Revision to QE-40.1 issued
- July 1992 - Communications Protocol issued to strengthen Engineering/Operations interface
- December 1992 - Nuclear Operations Division Reorganization
- February 1994 - Operability Assessment Improvement Action Plan developed

DEFINITION OF ISSUES

The following issues, experienced to a varying degree from site to site, form the basis for the need to improve the process:

Ownership for ultimate determination of operability not clearly established

Distinction between Operability Determination (decision) and Evaluation (supporting arguments) unclear

Timeliness not always commensurate with safety significance

Lack of early involvement of Operations personnel

Process not well linked with Integrated Reporting Program
(Division-wide problem identification, reporting and resolution process)

Threshold for documentation too high

Existing procedures not consistent with post reorganization conduct of business

Confusion due to separate "Operations" and "Engineering" procedures

OPERABILITY ASSESSMENT IMPROVEMENT ACTION PLAN

Multi-Disciplined Team Approach

"World Class" Process

DISCUSSION OF REVISED PROCESS

Process flow model created to visualize the process

Final draft of flow model developed

Critical process enhancements

Distinction between Determination VS. Evaluation clearly established

Ownership is clear

Integration with IRP

early Operations involvement

documentation threshold clarified

formalizes confirmatory engineering evaluation for initial determination

Commonwealth Edison Company's Approach for Improving the Operability Assessment Process

Agenda

- **Background**
- **Definition of Issues**
- **Operability Assessment Improvement Action Plan**
- **Discussion of Revised Process (Flow Chart)**
- **Feedback**

Background

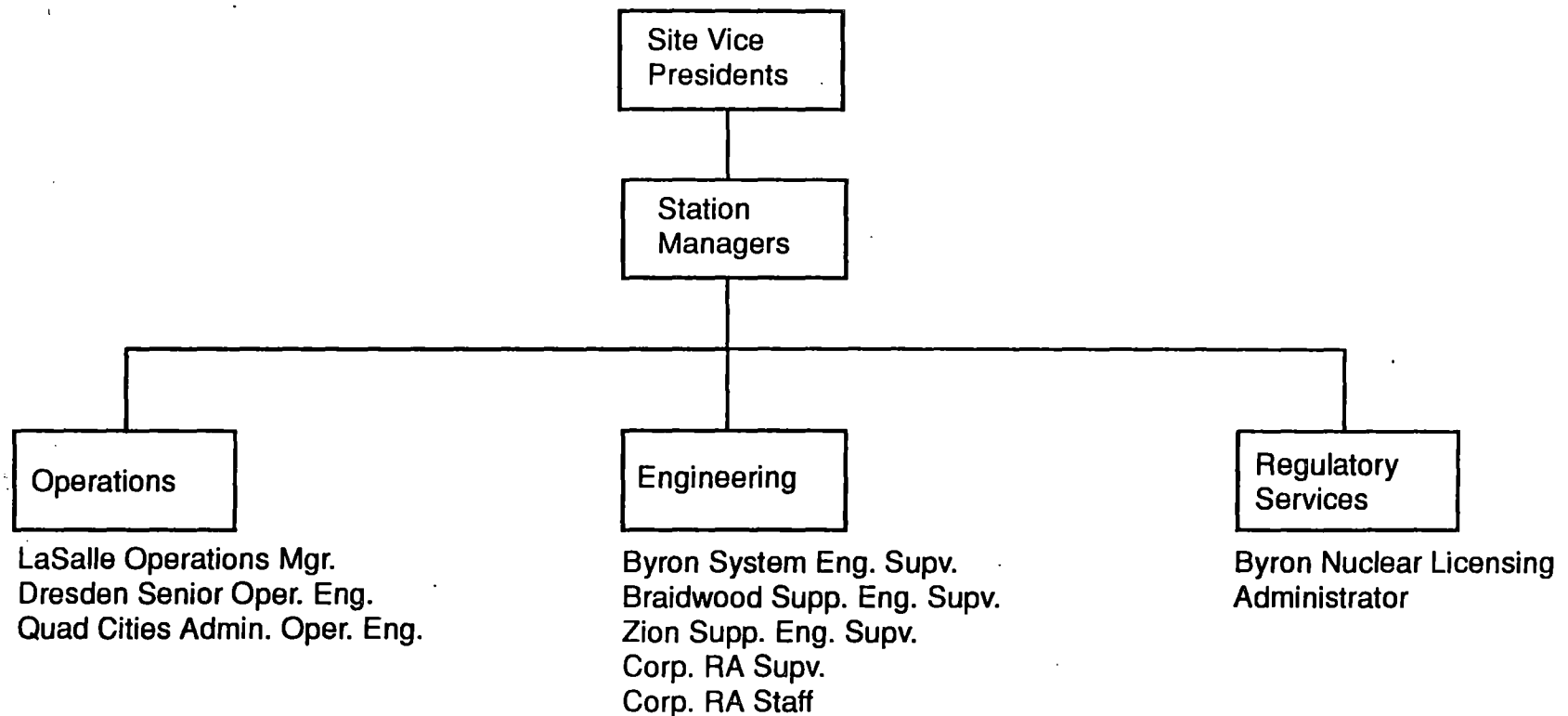
- 06/89 - CECo Operability Task Force formed**
- 01/90 - NOD "Conduct of Operations" revised**
- 10/90 - QE-40.1 issued**
- 11/91 - GL 91-18 issued**
- 01/92 - QE-40.1 revised**
- 07/92 - Communications Protocol issued**
- 12/92 - NOD Reorganization**
- 02/94 - Operability Assessment Improvement
Action Plan developed**

Definition of Issues

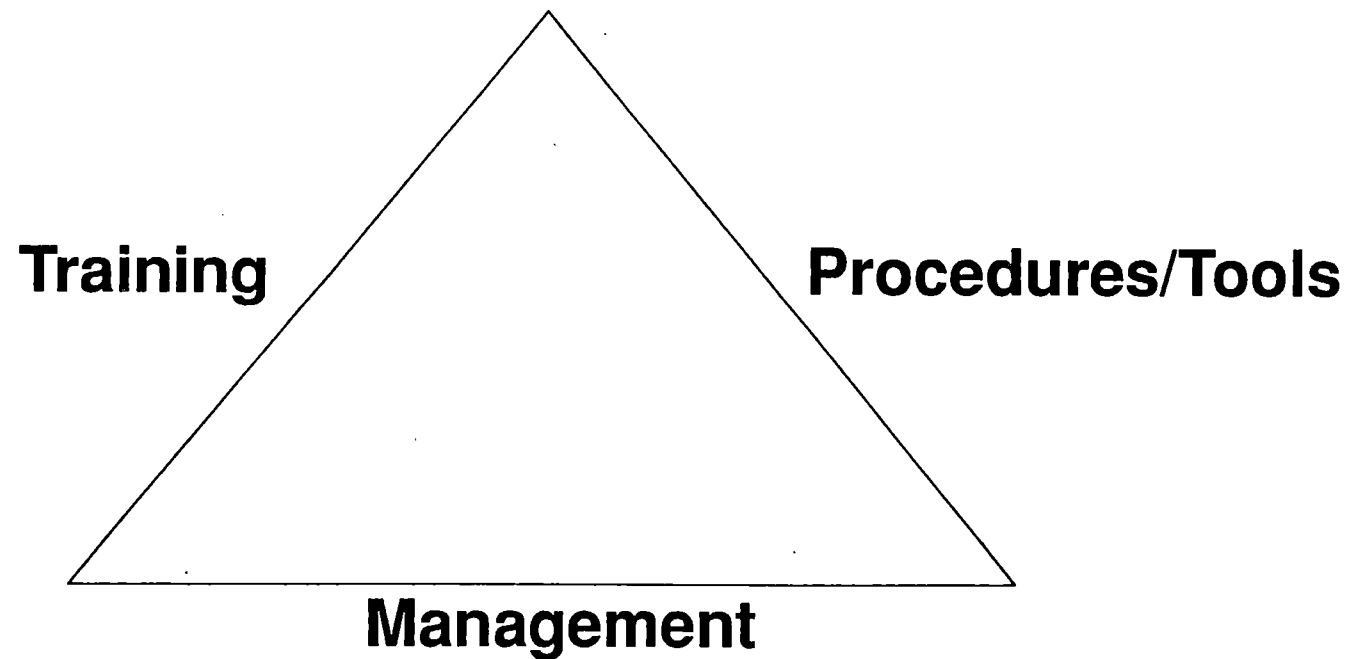
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- **Distinction between Operability Determination (decision) and Evaluation (supporting arguments) unclear**
- **Timeliness not always commensurate with safety significance**
- **Lack of early involvement of Operations personnel**
- **Process not well linked with Integrated Reporting Program (Division-wide problem identification, reporting and resolution process)**
- **Threshold for documentation too high**
- **Existing procedures not consistent with post reorganization conduct of business**
- **Confusion due to separate "Operations" and "Engineering" procedures**

Operability Assessment Process Improvement Multi-Disciplined Team

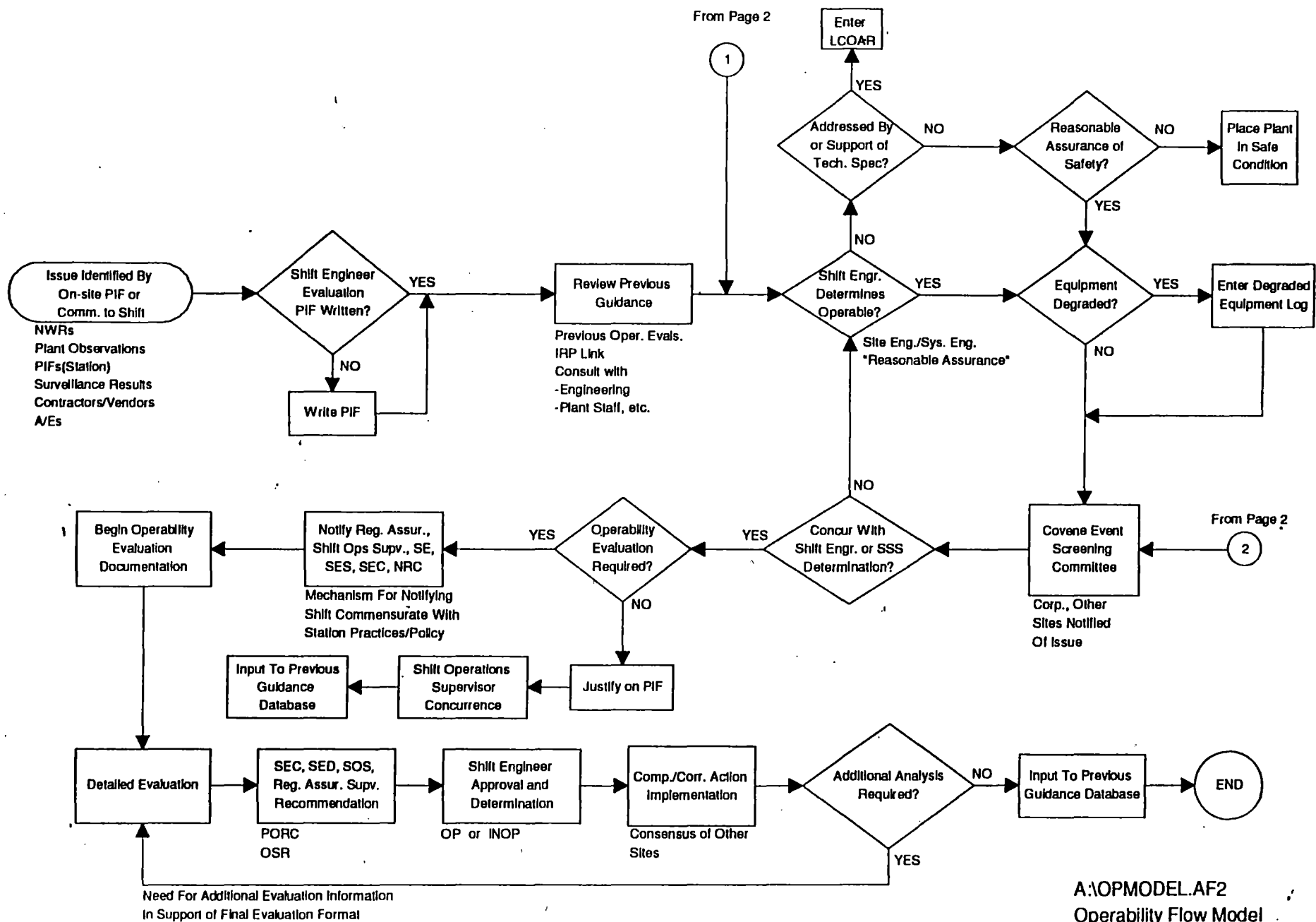


"World Class" Operability Assessment Process



Discussion of Revised Process

- **Process flow model created to visualize the process**
- **Final draft of flow model developed**
- **Critical process enhancements**
 - **Distinction between Determination vs. Evaluation clearly established**
 - **Ownership is clear**
 - **Integration with IRP**
 - ▶ **early Operations involvement**
 - ▶ **documentation threshold clarified**
 - ▶ **formalizes confirmatory engineering evaluation for initial determination**



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Operability Flow Model

Process Entry Flow Path for Off-Site Identified Issues

