Commonwealth Edison
LaSalle County Nuclear Station
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Marseilles, Illinois 61341
Telephone 815/357-6761

May 3, 1994

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington., D.C. 20555

Attn: Document Control Clerk

Subject: **Dresden Station Units 2 and 3**
Quad Cities Station Units 1 and 2
LaSalle Station Units 1 and 2
Transmittal of BWR Immediate Improvement Strategy Status Report
NRC Docket Nos. 50-273/249, 50-524, and 50-373/374

Dear Mr. Russell:

Attached is the third bi-weekly BWR Immediate Improvement Status Report. The next report will be issued in mid May 1994. The report focuses on significant exceptions, both positive and negative, involving the four critical focus areas of the BWR Immediate Improvement Initiatives. The report collates separate station reports provided by Dresden, Quad Cities, and LaSalle Stations.

The significant exceptions for the four metric areas will be reported for each period. The discussion will be on trends, analysis, actions, challenges and anecdotal success stories when available.

The complete metrics are attached for Dresden, Quad Cities, and LaSalle. Unless noted otherwise, the only data changed will be the updated status column.

Please direct any questions you may have with regards to this transmittal to this office.

Very truly yours,

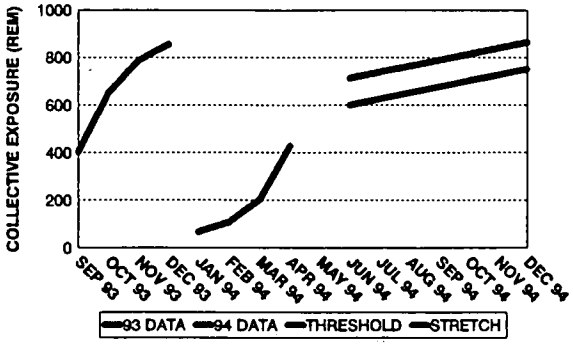
I. M. Johnson
Licensing Operations Director

cc: J. Martin, Regional Administrator - Region III
J. Dyer, Project Director - NRR
B. Clayton, NRC Region III
Office of Nuclear Safety - IDNS

A001

LASALLE COUNTY NUCLEAR STATION

YEAR END EXPOSURE



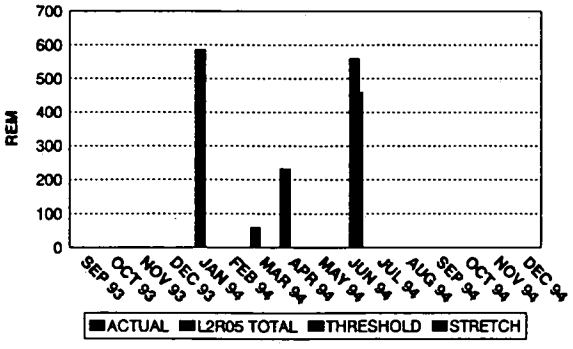
RADIATION PROTECTION 4/29/94

Analysis

Accumulated person-rem exposure is 73 rem over the stretch goal of 356 rem. Much of this exposure can be attributed to additional exposure from forced and maintenance outages earlier in the year and lowering the stretch goal for yearly exposure. This months contributor was the outage currently in progress. Although the outage is under goal at the present time, the significant strides in exposure reduction during the outage have not yet been realized.

LASALLE COUNTY NUCLEAR STATION

L1R06 EXPOSURE



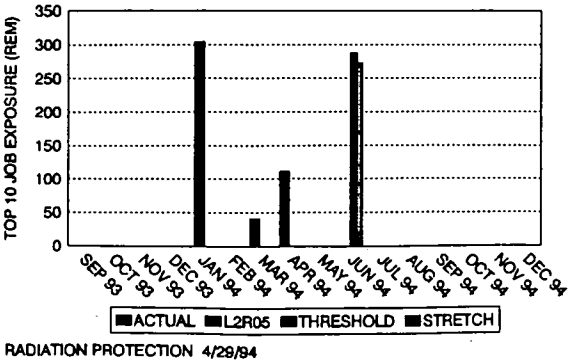
RADIATION PROTECTION 4/29/94

Analysis

Outage exposure for L1RO6 is 3 Rem under goal to date. As mentioned above, significant dose savings have not yet been realized. This is unfortunate in that the outage activities represents the most opportunity for dose savings. Two significant contributors were expanded scope repairs to the feedwater check valves and the 1B Inboard MSIV.

LASALLE COUNTY NUCLEAR STATION

L1R06 TOP 10 JOBS RADIATION EXPOSURE



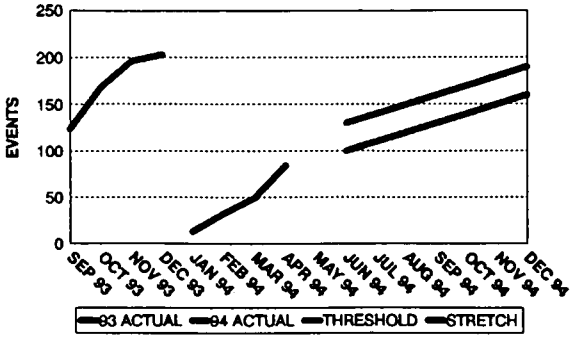
RADIATION PROTECTION 4/29/94

Analysis

The Top 10 Repetitive Jobs identified for the current outage have used 47% of the dose allotted for the stretch goal with 68% of the work accomplished. There is a good opportunity to achieve our stretch goal which would represent a dose savings of an additional 24 Rem under our previous goal.

LASALLE COUNTY NUCLEAR STATION

PERSONNEL CONTAMINATION EVENTS (PCE)



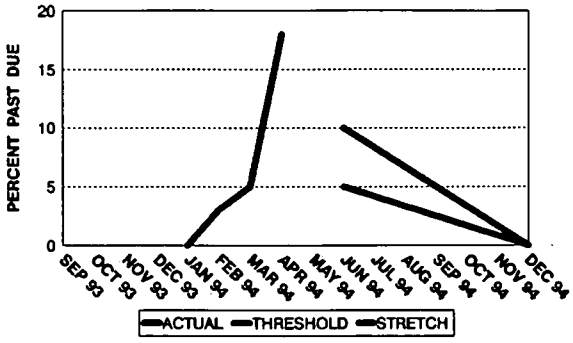
RADIATION PROTECTION 4/29/94

Analysis

The trend for personnel contamination events is on an unacceptable trend. At present there have been 88 Personnel contamination events. At the current rate, and with 5 weeks of outage remaining, the threshold goal of 130 for June is in jeopardy. Additional management attention will be applied in this area.

LASALLE COUNTY NUCLEAR STATION

LBDT ACTION PLAN IMPLEMENTATION



STATION SPECIFIC 4/29/94

Analysis

The number of overdue BUP action items is unacceptable. 18% of those items currently due have not been completed. The recent formation of the BUP Group on April 22nd was designed to facilitate the implementation of the BUP not only to ensure actions are completed on time, but also to ensure the actions were adequate in solving the issue.

General Comments - The current outage, L1RO6 is on schedule. Fuel Load is scheduled for May 6th. In addition, LaSalle Unit 2 has achieved in excess of 100 days continuous operation. However, the station realizes that it is important to properly implement the action plan contained in the Business Unit Plan. The recent formation of the BUP Group is expected to ensure timely, complete, and effective implementation of the BUP.

LASALLE STATION
Rev 1, 03-25-94

Program Element RADIATION PROTECTION	Baseline Historical Data or 1993 Actual	Actual Year to date 04-29-94	Benchmark	Threshold 6/94	Stretch 6/94	Threshold 12/94	Stretch 12/94
1. Collective Exposure							
a. >Top 10 Repetitive Jobs (NOTE A)	304 Rem	112 Rem	N/A	5% Reduction 289	10% Reduction 274	N/A	N/A
b. > Outage Exposure (NOTE A)	587 Rem	233 Rem	N/A	<561 Rem	≤463 Rem	N/A	N/A
c. >Non-outage Rem/Work Day	1.29 Rem/Day	N/A	80 mrem	N/A (NOTE B)	N/A (NOTE B)	<1.22 Rem/Day	≤1.17 Rem/Day
d. >Year End Exposure	855 Rem/Total	429 Rem	462 Rem/Total (3 Yr. rolling average)	712 Rem/Total	600 Rem/Total	865 Rem/Total	750Rem/Total
e. >Hot Spot Elimination	225	212	N/A	214	202	N/A	N/A

Program Element RADIATION PROTECTION	Baseline Historical Data or 1993 Actual	Actual Year to date 04-29-94	Benchmark	Threshold 6/94	Stretch 6/94	Threshold 12/94	Stretch 12/94
2. R/W PRACTICES a. Adherence Events	15 (NOTE G)	6	4	9	7	12	10
b. >High Rad Area Violations	6	2	0	3	2	5	3
c. >PCEs	203	84	100	130	100	190	160
3. Rad Matl Violations	35	4	0	6	4	8	5
4.Contaminated Area	6.1% was best in 1993	20.2%	5.0%	20.9%	20.4%	5.0%	4.0%
5. Shoe Contaminations All events (</>1K)	234	88	10(non-outage per month) 25(outage per month)	130	115	200	180

MATERIAL CONDITION	1993 ACTUAL	ACTUAL YEAR TO DATE 04-29-94	BENCHMARK	THRESHOLD 6/94	STRETCH 6/94	THRESHOLD 12/94	STRETCH 12/94
1. Temporary alterations >30 Days (NOTE H)	100	85	<30	<55	<30	<33	<25
2. Backlog of NWR	643	680	325	750	700	450	425
3. Backlog of control room NWR	22	18	6	14	12	10	8
4. MOV commitment completion	U-1 114 Static 12 dp U-2 115 Static 23 dp	U-1 129 Static 15 dp U-2 115 Static 23 dp	Per site commitment 262 Static 102 dp (NOTE C)	U-1 134 Static 34 dp U-2 N/A (NOTE D)	U-1 N/A 37 dp U-2 N/A	U-1 N/A U-2 N/A (NOTE E)	U-1 N/A U-2 N/A (NOTE E)
5. Refuel outage performance	90%-End of L2RO5	67%	90%	90% End of L1RO6	95% End of L1RO6	N/A	N/A
6. Safety system a. Industry b. NRC	.017 (12 - 3rd Qtr. 1993)	.0457 (Under Development)	.025 1/Qrt./Unit	.0175 (Under Development)	.0175 (Under Development)	.0175 (Under Development)	.0175 (Under Development)
7. Operator work arounds	63	63 (NOTE F)	0	5% Reduction	10% Reduction	20% Reduction	30% Reduction
STATION SPECIFIC:							
1. Resolution of key site specific issues (Implementation of LBDT Action Plan.	See LBDT Report	18% overdue	N/A	<10% Overdue actions	<5% overdue actions	0 overdue actions	0 overdue actions

PROBLEM IDENTIFICATION & RESOLUTION	1993 ACTUALS	ACTUAL YEAR TO DATE 04-29-94	BENCHMARK	THRESHOLD 6/94	STRETCH 6/94	THRESHOLD 12/94	STRETCH 12/94
1. Average age of PIF backlog	50 days	68 days	Level 4 < 45 days, Level 3,2,1 < 30 days	<60 days	<45 days	<60 days	<45 days
2. Number of PIFS	1564	1113	3000	1200	1500	2400	3000
3. % of PIFS (1,2,3) investigations	16%	12%	10% of total	15%	15%	10%	10%
4. CAR completion	11 Overdue 6 Category B	0 Overdue 8 Category B	0 Overdue 0 Cat. A or B	0 Overdue 0 Cat. A 5 Cat. B	0 Overdue 0 Cat. A 4 Cat. B	0 Overdue 0 Cat. A 2 Cat. B	0 Overdue 0 Cat. A or B
5. Recurring problems	N/A	0	0	2	1	3	2

HUMAN PERFORMANCE	1993 ACTUALS	ACTUAL YEAR TO DATE 04-29-94	BENCHMARK	THRESHOLD 6/94	STRETCH 6/94	THRESHOLD 12/94	STRETCH 12/94
1.Personnel related events	48 (NOTE G)	20	30% decrease from 1993 value	40	30	50	40
2. a. Industrial Safety Accident Rate (per 200,000 hours) b. OSHA recordables	a. 0.998 b. 19	a. 0.0 b. 1	a. 0.5 b. n/a	a. 0.75 b. 5	a. 0.60 b. 3	a. 0.70 b. 11	a. 0.60 b. 9
3. Reactivity management	0	1	0	1	1	1	1
4. Procedure adherence events	18 (NOTE G)	2	0	8	6	12	10

NOTE A: **Based on the L1RO6 refueling outage, schedule completion date is first week of June 1994.**

NOTE B: **Minimal data available - Units in either a planned or unplanned outage until early June 1994.**

NOTE C: **Does not include MOV's included in the Steam Condensing mode of RHR which will be deleted from the GL 89-10 program by June 1994.**

NOTE D: **Margin evaluations on GL 89-10 MOV's will be completed by June 28, 1994.**

NOTE E: **For Unit 2, the "third refuel outage" in the GL 89-10 process is L2RO6. This outage scope is to be finalized by September, 1994.**

NOTE F: **The identification of station work arounds is expected to increase as the definition stabilizes and personnel realize that their concerns are being acted upon. The 6/94 and 12/94 reduction percentages are based on the original number identified.**

NOTE G: **PIF process under development in 1993. The number of Radiation Worker practices, Personnel Related Events and Procedural Adherence Events are expected to increase as PIF usage increases.**

NOTE H: **Temp Alt numbers include Unit 2: 15 require refuel L2RO6 (2/94): 15 non-outage 1994 (June-Dec.)**

QUAD CITIES METRICS (page 1) 4/23/94

PROGRAM ELEMENT	BASELINE	ACTUAL	BENCH MARK	THRESHOLD LEVEL OF IMPROVEMENT JUNE 1994	STRETCH GOAL JUNE 1994	THRESHOLD LEVEL OF IMPROVEMENT DECEMBER 1994	STRETCH GOAL DECEMBER 1994
RADIATION PROTECTION							
1. Collective exposure							
10 outage repetitive jobs	73.4 Rem	26 Rem		69.7 End of Outage	66.2		
> Outage exposure	825 Rem	367 Rem		< Outage goal (<825 Rem)	90% of Goal	N/A	N/A
> Non-outage rem/day	1.3 R/day	1.25		N/A	N/A	≤1.30 Rem/day	≤ 1.17 Rem/day
> Year end exposure	849 Rem	468 Rem		N/A	N/A	≤ 1250	≤ 1200
>Hot spot elimination	97	95	none available	92	88	88	83
2. Rad Worker practices/adherence events	13	3	4	≤ 7	≤ 6	≤ 10	≤ 8
> High Rad violations	5	2	0	1	0	1	0
> PCE's	149	186	50/unit	≤ 135	≤ 120	≤ 190	≤ 175
3. Rad material violations	7	1	0	≤ 4	≤ 3	≤ 5	≤ 3
4. Contaminated area	67,800 sq ft	88,900 sq ft (30 %)	5% nonoutage, outage threshold/stretch, 5% / 10% < 1993 value	109,600 sq ft (≤ 37%)	103,700 sq ft (≤35%)	59,200 sq ft (≤ 20%)	53,300 sq ft (≤ 18%)

QUAD CITIES METRICS (page 2) 4/23/94

PROGRAM ELEMENT	BASELINE	ACTUAL	BENCH MARK	THRESHOLD LEVEL OF IMPROVEMENT JUNE 1994	STRETCH GOAL JUNE 1994	THRESHOLD LEVEL OF IMPROVEMENT DECEMBER 1994	STRETCH GOAL DECEMBER 1994
STATION SPECIFIC:							
5. Shoe contaminations: (< and > 1K combined)	52	35	All shoe nonoutage 10/month, outage 25/month	32	30	52	48

QUAD CITIES METRICS (page 3) 4/23/94

PROGRAM ELEMENT	BASELINE	ACTUAL	BENCH MARK	THRESHOLD LEVEL OF IMPROVEMENT JUNE 1994	STRETCH GOAL JUNE 1994	THRESHOLD LEVEL OF IMPROVEMENT DECEMBER 1994	STRETCH GOAL DECEMBER 1994
MATERIAL CONDITION							
1. Temporary alterations *	57	60	<30	≤ 100		≤ 55	≤ 50
2. Backlog of NWR	915	1544	325 nonoutage	1830		1380	1330
3. Backlog of control room NWR	44	38	6 nonoutage	≤ 30	≤ 25	≤ 25	≤ 20
4. MOV commitment completion	U-1 57 static 16 dp U-2 81 static 20 dp	U-1 61 static 24 dp U-2 82 static 21 dp	Per site commitment	U-1 83 static 29 dp U-2 82 static 21 dp (End of Q1R13)		U-1 89 static 33 dp U-2 82 static 25 dp	
5. Refuel outage performance (% of planned work accomplished)		31%	90%				

QUAD CITIES METRICS (page 4) 4/23/94

PROGRAM ELEMENT	BASELINE	ACTUAL	BENCH MARK	THRESHOLD LEVEL OF IMPROVEMENT JUNE 1994	STRETCH GOAL JUNE 1994	THRESHOLD LEVEL OF IMPROVEMENT DECEMBER 1994	STRETCH GOAL DECEMBER 1994
6. Safety system performance	U-1 HPCI 0.208 U-1 RCIC 0.001 U-2 HPCI 0.065 U-2 RCIC 0.016 EDG 0.028 ++++++++++ NRC: U-1 = 9 U-2 = 11	U-1 HPCI 0.061 U-1 RCIC 0.013 U2 HPCI 0.009 U-2 RCIC 0.115 EDG 0.015 ++++++++++ 1st Qtr 94: U-1 = 1 U-2 = 3	HPCI 0.025 RCIC 0.020 EDG 0.025 ++++++++++ 1 Failure/qtr	++++++++++ U-1 ≤ 7 U-2 ≤ 9	++++++++++ U-1 ≤ 5 U-2 ≤ 7	**Year End** U-1 HPCI ≤ 0.030 U-1 RCIC ≤ 0.025 U-2 HPCI ≤ 0.030 U-2 RCIC ≤ 0.025 EDG ≤ 0.030 ++++++++++ U-1 ≤ 5 U-2 ≤ 6	++++++++++ U-1 ≤ 3 U-2 ≤ 3
7. Operator work arounds ***	79	38	0	< 21	< 18	< 13	< 10
STATION SPECIFIC:							
1. Resolution of key site specific issues (BDT, DET, VAT, IPE, Top 50 Technical issues @ Dresden)	VAT 268	171		189	186	169	159

QUAD CITIES METRICS (page 5) 4/23/94

PROGRAM ELEMENT	BASELINE	ACTUAL	BENCH MARK	THRESHOLD LEVEL OF IMPROVEMENT JUNE 1994	STRETCH GOAL JUNE 1994	THRESHOLD LEVEL OF IMPROVEMENT DECEMBER 1994	STRETCH GOAL DECEMBER 1994
PROBLEM IDENTIFICATION & RESOLUTION							
1. Average age of PIF backlog	Level 4 = 140 days Level 3 = 110 days	Level 4 = 94 Level 3 = 120	Level 4 < 45 days, Level 3,2,1 < 30 days	Maintain Current Level		Level 4 - 100 days Level 3 - 80 days	Level 4 - 90 days Level 3 - 70 days
2. Number of PIFS	2054	1038	3000	1300	1500	2600	3000
3. % of PIFS (1,2,3) investigations	9%	4.7%	10% of total	Maintain		Maintain	
4. CAR completion (Level A & B)	14 > 60 days (4 open)	15 > 60 days (5 open)	10 > 60 days, with none on QV hit list	< 15 greater than 60 days	< 10	< 10	< 8
5. Recurring problems	0	0	0 level 3,2,1 (5 level 4's become a level 3)	0	0	0	0
6. NRC identified problems resulting in violations ****	28						
PIF identified Violation Data from 1st qtr 1994 ****							

QUAD CITIES METRICS (page 6) 4/23/94

PROGRAM ELEMENT	BASELINE	ACTUAL	BENCH MARK	THRESHOLD LEVEL OF IMPROVEMENT JUNE 1994	STRETCH GOAL JUNE 1994	THRESHOLD LEVEL OF IMPROVEMENT DECEMBER 1994	STRETCH GOAL DECEMBER 1994
HUMAN PERFORMANCE							
1.Personnel error events	30	3	30% decrease from 1993 value	12	10	23	20
2. Accident Rate		0.72	for 1995 0.5	0.92	0.85	< 0.92	< 0.85
3. Reactivity management	4	1	1	1	1	1	1
4. Procedure adherence events	45	1	0	20	19	34	32

* Temp Alts - Number will rise as a result of discovery and refuel outage. Threshold of improvement will be of all identified.

** All operability evaluations completed by 6/28/94.

*** This metric will focus on currently identified workarounds.

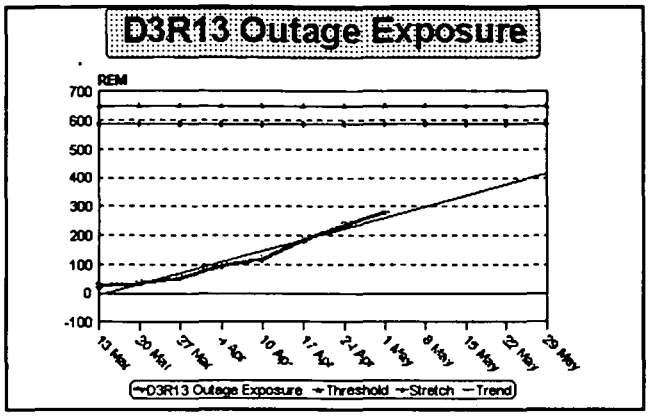
**** Both metrics will be tracked, however, no goals have been established.

Performance Indicator Report

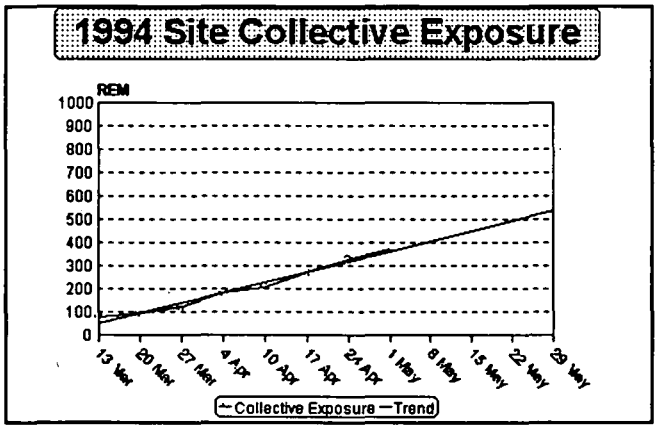
for Dresden Station

Radiation Protection
Human Performance
Materiel Condition
Problem Identification/Resolution

Reporting Period: April 18 through May 1, 1994

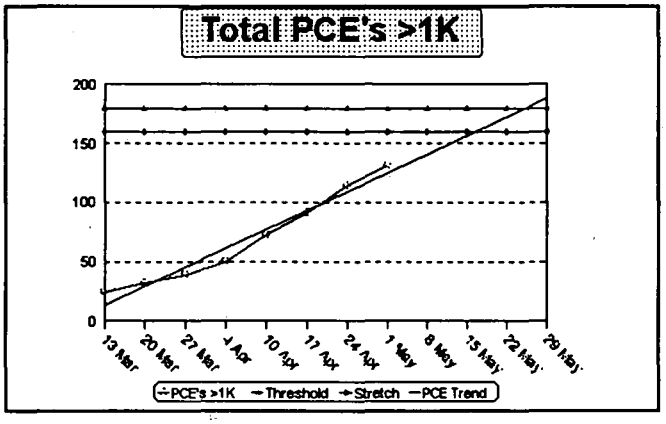


Analysis: Trends for this indicator continue to show performance that will exceed management's expectations. Success will depend heavily on the final resolution of the Unit 3 core shroud cracking issue.



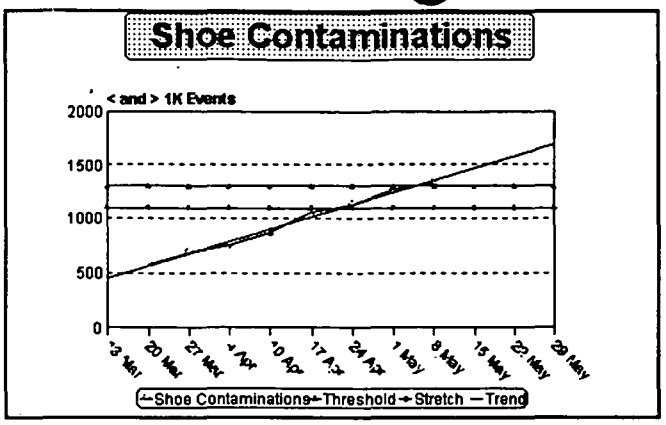
Analysis: Trends for this indicator continue to show performance that will exceed management's expectations.

Actions: Control of emergent work and improvement in worker practices will ensure, in part, success in this area.



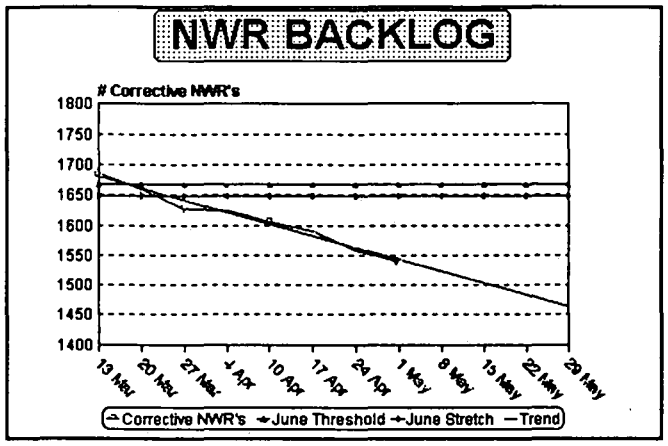
Analysis: Performance in this area is now projected to not meet management's expectations based on the latest trend data.

Actions: Adherence to sound radiological principles and increased management attention toward worker practices will be required to reverse this trend.



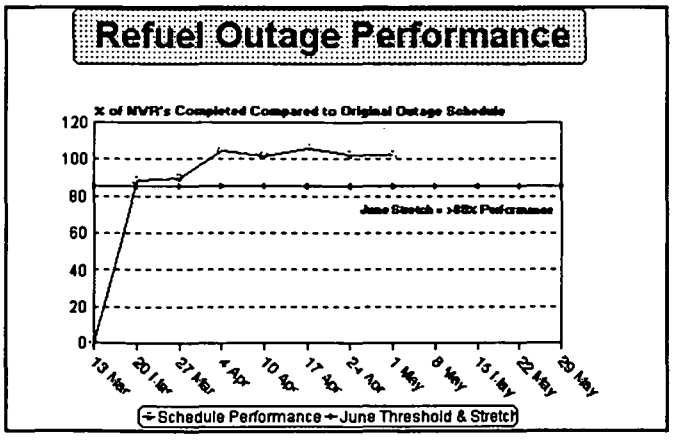
Analysis: This area of performance continues to trend in a negative direction and will not meet management's expectations for performance.

Actions: The site has commissioned FPI, Int'l. to assist in determining a root cause for the negative trend in this area.



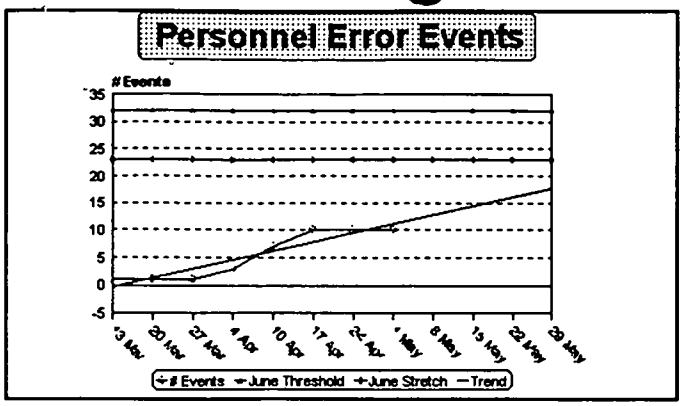
Analysis: This performance indicator continues to show steady measured improvement with performance meeting management's expectations from a numerical perspective.

Actions: Principal improvement can be attributed to the Instrument Maintenance Department. The site's challenge is to drive the same improvement trend in the other maintenance departments.

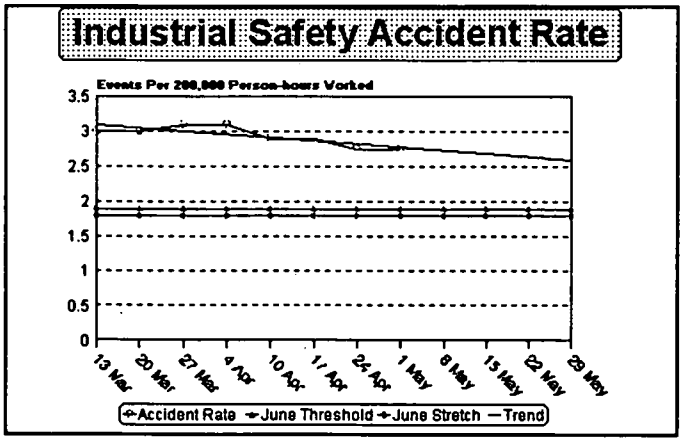


Analysis: Performance continues to exceed management expectations in terms of numerical performance to the original outage schedule.

Actions: Continued diligence is required to control emergent work scope.

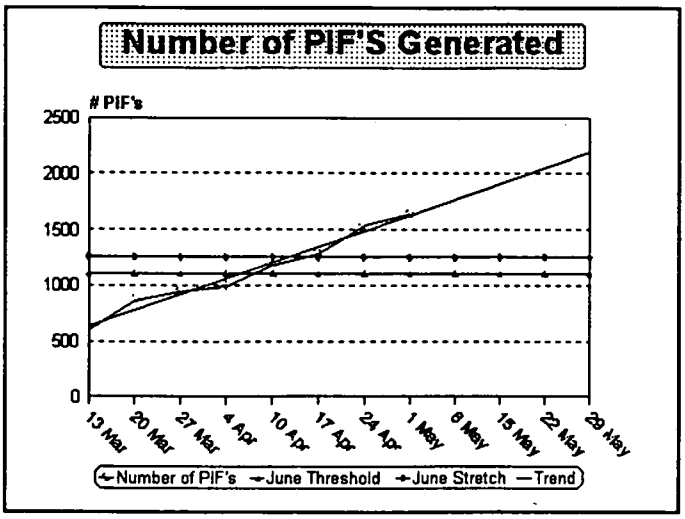


Analysis: Performance in this area continues to trend positively and is expected to exceed management's expectations.



Analysis: Performance over the past two (2) weeks has shown a positive improvement. However, the numerical data does not meet management's expectations.

Actions: Management must continue to be focused on human performance and ensure nothing but the highest standards are tolerated.



Analysis: Performance in this area continues to exceed management expectations.

Dresden Site Performance Indicator Trending

MATERIEL CONDITION	June 1994 Threshold	Stretch	24-Apr-94	1-May-94	8-May-94	15-May-94	22-May-94	29-May-94
Top 10 Repetitive Jobs (Rem)								
> Reactor Head	10.45	9.90	5.13	5.135				
> CRD pull/put	11.80	11.18	9.69	9.69				
> Drywell MSIV	7.20	6.82	0.031	0.088				
> 3A RR Pump	1.38	1.31	0.179	0.367				
> 3B RR Pump	1.24	1.17	0.201	0.45				
> Drywell ISI	35.17	33.32	8.317	14.262				
> Drywell Shielding	14.60	13.83	8.862	9.034				
> CRD leak test/rebuild	11.85	11.22	4.23	4.528				
> DW Snubber inspec.	13.76	13.04	1.545	2.055				
> DW Mn Stm Rel VLV Rep	8.82	8.36	0.204	0.306				
TOTAL EST. EXPOSURE (above 10 jobs)	116.26	110.14	38.389	45.915				
Hot Spot Reduction (number of hot spots)	43	40	31	31				
Contaminated Area (% of plant)	17.00%	16.00%	17.30%	17.50%				
Temporary Alterations (# of >30 days)	<30	17	38	36				
Backlog of NWR's	1667	1649	1559	1538				
Backlog of Control Room NWR (Corrective)	11	<6 >2wks	22	26				
Total outage/Non-outage CC NWR's			51	48				
MOV Commitment								
> U-2 dP tests	5	8	8	8				
> U-3 dP tests	27	29	7	7				
> U-2 Static Testing	82	82	74	74				
> U-3 Static Testing	78	78	47	47				
> Operability for high & medium	160	160	141	141				
safety significant, low margin vlvs								
Refuel Outage Performance	85.00%	> 85.00%	102.00%	102.00%				
Safety System Performance								
* HPCI (INPO)								
> Unit 2	</= 0.025	</= 0.023	0.018	0.017				
> Unit 3	</= 0.025	</= 0.023	0.043	0.043				

* LPCI (INPO)								
> Unit 2	</= 0.020	</= 0.019	0	0				
> Unit 3	</= 0.020	</= 0.019	0.025	0.024				
* Emergency A/C (INPO)								
> Unit 2	</= 0.025	</= 0.023	0.025	0.023				
> Unit 3	</= 0.025	</= 0.023	0.051	0.048				
* Safety System Failures (NRC)								
> Unit 2								
> Unit 3								
Operator Work Arounds								
> Unit 1	< 10	< 10	1	1				
> Unit 2	< 10	< 10	8	8				
> Unit 2/3	< 10	< 10	6	6				
> Unit 3	< 10	< 10	10	10				
> Radwaste	< 10	< 10	TBD	TBD				
Top 50 Technical Issues	20	20	2	3				
HUMAN PERFORMANCE								
Outage Exposure (Rem)	650.00	585.00	235.652	279.788				
Non-outage Rem/day (does not incl. outages)	N/A	N/A	1.355	1.362				
Year end exposure (Rem)			326.041	372.924				
Rad Worker Events (Level 1,2,3 PIF's)	5	4	1	1				
High Rad Area Violations (Level 1,2,3 PIF's)	4	2	2	3				
PCE's (>1K dpm/100cm2)	180	160	114	131				
Rad Material Violations (Level 1,2,3 PIF's)	6	4	10	12				
Shoe Contaminations (< & > 1K/100cm2)	1300	1100	1264	1329				
Personnel Error Events	32	23	10	10				
Accident Rate	1.9	1.8	2.75	2.75				
Reactivity Management	0	0	0	0				
Procedure Adherence Events	11	8	2	3				
PERFORMANCE MONITORING								
Average Age of PIF Backlog	34 days	< 30 days	32	32				
Number of PIF's	1100	1250	1538	1638				
% of PIF's (Lev. 1,2,3) Investigations	12.00%	11.00%	10.00%	9.70%				
CAR Completion								
> Overdue responses (> 60 days)	0	0	1	2				
> Level A CAR's	0	0	0	0				
> Level B CAR's	3	2	1	1				
Recurring Problems	2	1	1	1				

NRC Ident. Problems Resulting In Violations								
> Ratio of Level 1,2,3 PIF's / total NOV's	Note 1	Note 1	0	0				
> Ratio of NCV's / NOV's	Note 1	Note 1	0.4	0.333				