Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 19, 1994

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

Attn: Document Control Desk

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, 50-254/265 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 early June 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 for
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

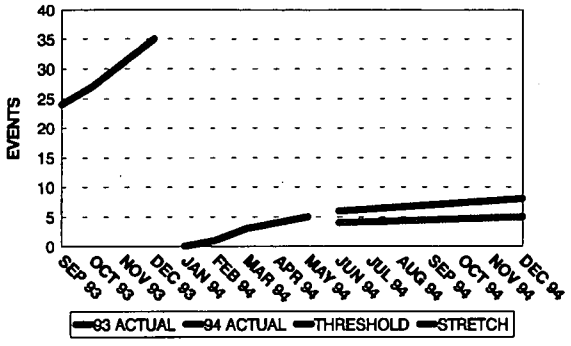
260060

k:nla:quad:imj:1

Note: Data is through May 13, 1994. As data accumulates during the month of May, performance trends may change.

LASALLE COUNTY NUCLEAR STATION

RAD MATERIAL VIOLATIONS



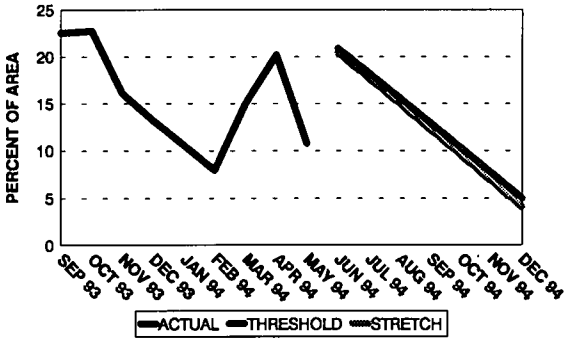
RADIATION PROTECTION 5/13/94

Analysis

Actions to control the amount of rad material found outside the RPA have been completed. These include the reduction of the amount of access points to the RPA from 6 to 2 along with monitors stationed at each access point 24 hours per day. A comprehensive survey for rad materials outside the RPA has been completed. This has established a baseline and will enable us to evaluate the effectiveness of our corrective actions.

LASALLE COUNTY NUCLEAR STATION

CONTAMINATED AREA



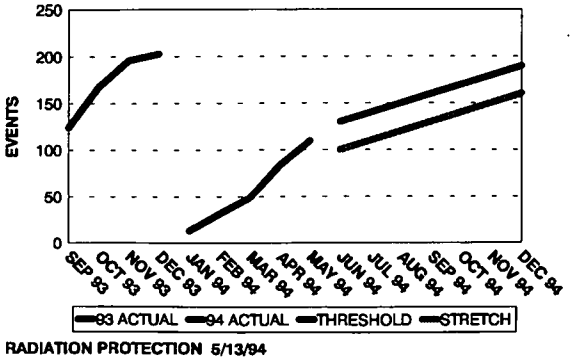
RAD PRACTICE 5/13/94

Analysis

Contaminated area has decreased from 20% to 10%. The area reclaimed has been on Unit 1 which is currently in a refueling outage. This reduction in contaminated area during the outage demonstrates the station's aggressiveness toward controlling the radiological conditions of the RPA.

LASALLE COUNTY NUCLEAR STATION

PERSONNEL CONTAMINATION EVENTS (PCE)



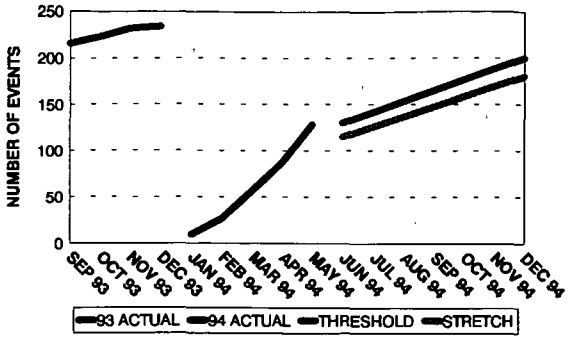
RADIATION PROTECTION 5/13/94

Analysis

Personnel Contamination Events have exceeded the stretch goal for June. Increased emphasis has been placed on cleaning of contaminated components, use of HEPAs, and wetting and/or covering of highly smearable components. Two factors have contributed to the number of PCEs, 1, implementation of 10CFR20 changes, and 2, increased maintenance activities due to forced outages earlier this year.

LASALLE COUNTY NUCLEAR STATION

SHOE CONTAMINATIONS



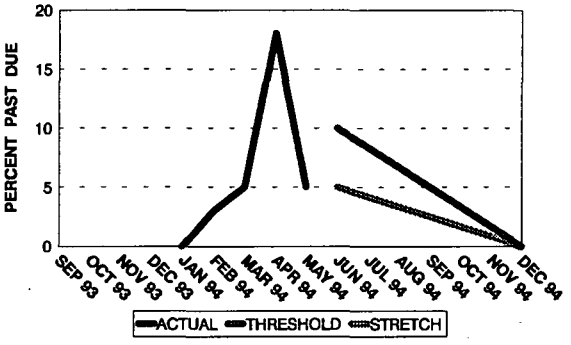
RAD PRACTICE 5/13/94

Analysis

The data for shoe contaminations shows 128 actual contaminations with a threshold goal for June of 130. These along with the PCE data mentioned above have been included in a level 3 PIF to determine the root cause of the apparent increase in outage contamination events.

LASALLE COUNTY NUCLEAR STATION

BUP ACTION PLAN IMPLEMENTATION



STATION SPECIFIC 5/13/94

Analysis

The BUP Group is addressing the amount of overdue action items. Action plan owners were contacted to determine the reasons for overdue actions and the assignment of a new due date if appropriate. This is the major reason for the recent trend. Additional parameters will be monitored in the future which will include the number of overdue actions by month and a measure of the amount of progress toward resolving issues.

General Comments - Major efforts for the station includes focusing on the proper implementation of the BUP. An overview document describing the major focus areas for improvement has been issued. This document was presented to all station personnel during a series of meetings conducted by the Site Vice President and the Sponsors of the BUP. The outage continues with the successful completion of core reload and verification. Outage completion is currently 1 day behind the original schedule.

LASALLE STATION
Rev 1, 03-25-94

Program Element RADIATION PROTECTION	Baseline Historical Data or 1993 Actual	Actual Year to date 05-13-94	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	160 Rem	N/A	5% Reduction 289	10% Reduction 274	N/A	N/A
b. > Outage Exposure (NOTE A)	587 Rem	295 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	504 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 05-13-94	Benchmark	Threshold 6/94	Stretch 6/94	Threshold 12/94	Stretch 12/94
2. R/W PRACTICES a. Adherence Events	15 (NOTE G)	7	4	9	7	12	10
b. >High Rad Area Violations	6	2	0	3	2	5	3
c. >PCEs	203	110	100	130	100	190	160
3. Rad Matl Violations	35	5	0	6	4	8	5
4.Contaminated Area	6.1% was best in 1993	10.7%	5.0%	20.9%	20.4%	5.0%	4.0%
5. Shoe Contaminations All events (</>1K)	234	128	10(non-outage per month) 25(outage per month)	130	115	200	180

MATERIAL CONDITION	1993 ACTUAL	ACTUAL YEAR TO DATE 05-13-94	BENCHMARK	THRESHOLD 6/94	STRETCH 6/94	THRESHOLD 12/94	STRETCH 12/94
1. Temporary alterations >30 Days (NOTE H)	100	73	<30	<55	<30	<33	<25
2. Backlog of NWR	643	668	325	750	700	450	425
3. Backlog of control room NWR	22	17	6	14	12	10	8
4. MOV commitment completion	U-1 114 Static 12 dp U-2 115 Static 23 dp	U-1 132 Static 19 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	79%	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)	.035 (Under Development)	.025 1/Qrt./Unit	.0175 (Under Development)	.0175 (Under Development)	.0175 (Under Development)	.0175 (Under Development)
7. Operator work arounds	61	61 (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 BUP Report	5% overdue	N/A	<10% Overdue actions	<5% overdue actions	0 overdue actions	0 overdue actions

PROBLEM IDENTIFICATION & RESOLUTION	1993 ACTUALS	ACTUAL YEAR TO DATE 05-13-94	BENCHMARK	THRESHOLD 6/94	STRETCH 6/94	THRESHOLD 12/94	STRETCH 12/94
1. Average age of PIF backlog	50 days	76 days	Level 4 < 45 days, Level 3,2,1 < 30 days	<60 days	<45 days	<60 days	<45 days
2. Number of PIFS	1564	1199	3000	1200	1500	2400	3000
3. % of PIFS (1,2,3) investigations	16%	11.5%	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 05-13-94	BENCHMARK	THRESHOLD 6/94	STRETCH 6/94	THRESHOLD 12/94	STRETCH 12/94
1.Personnel related events	48 (NOTE G)	22	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)	3	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.

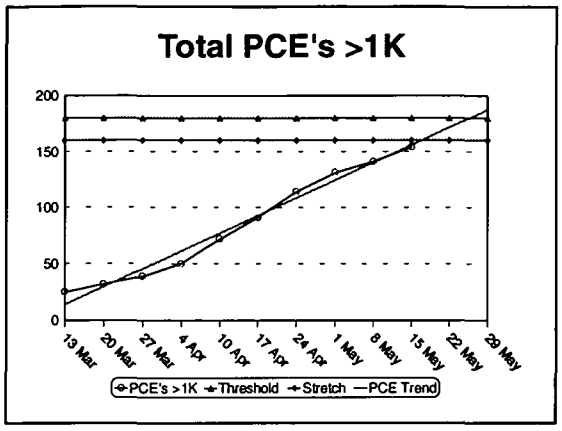
NOTE H: Temp Alt numbers include Unit 2: 15 require refuel L2RO6 (2/94): 15 non-outage 1994 (June-Dec.)

Performance Indicator Report

for Dresden Station

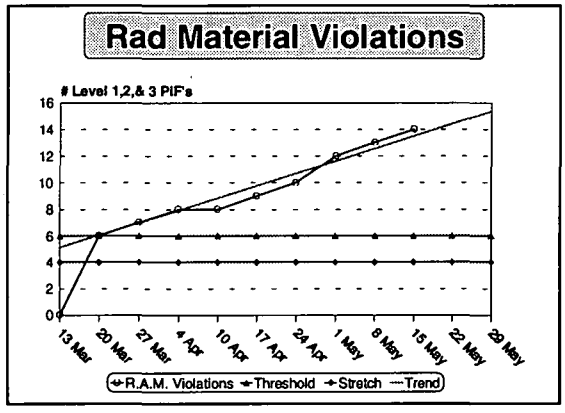
Exceptions Trending
In a Negative Direction

Reporting Period: May 1 through May 15, 1994



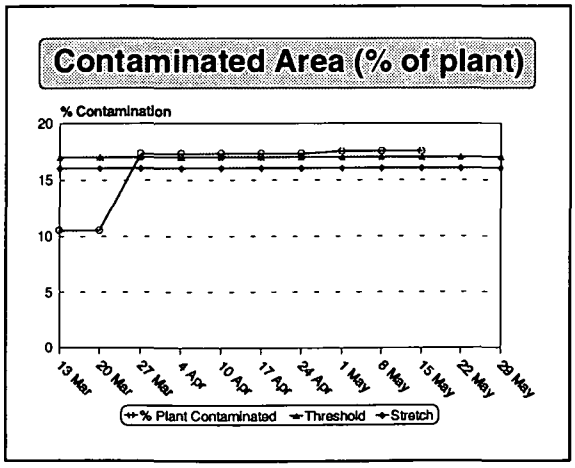
Analysis: Performance in this area continues to project beyond acceptable limits.

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



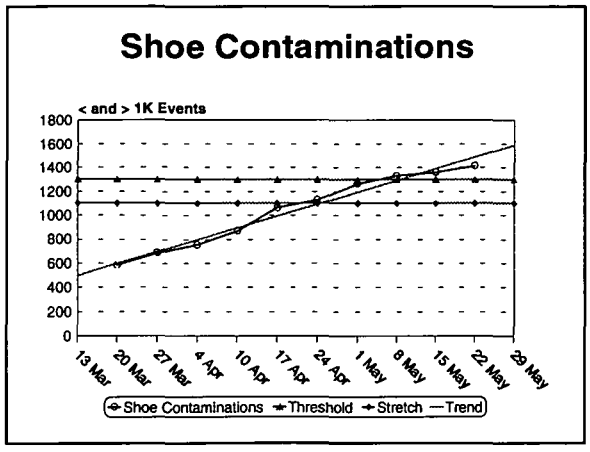
Analysis: This indicator continues to be unacceptable and is continuing to trend away from an acceptable condition

Action: Continued emphasis on the need for adherence to sound radiation materials practices by all personnel will be necessary to reverse this trend



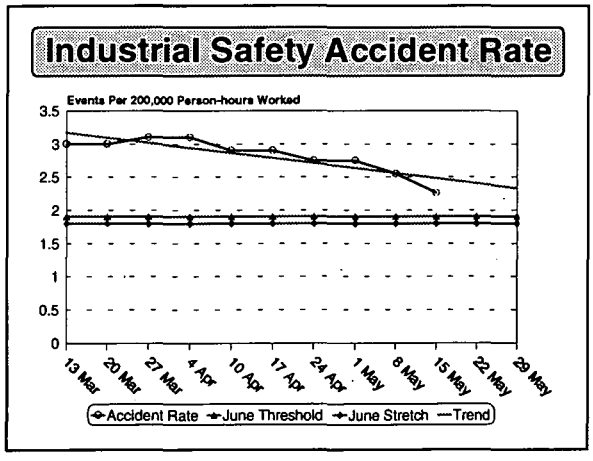
Analysis: This indicator continues to hold in the just unacceptable range. No significant increase is noted as a result of the outage, nor has any decrease resulted from outage cleanup efforts.

Action: The further reduction in contaminated area will result from specific action to reduce these areas.



Analysis: Shoe contaminations are increasing at a steady rate and exceed acceptable conditions.

Actions: The Site has commissioned FPI International to assist in determining a root cause for the negative trend in this area.



Analysis: Performance in this area is not yet acceptable, but is trending toward an acceptable condition.

Action: Continued emphasis on human performance and safety.

Dresden Site Performance Indicator Trending

MATERIEL CONDITION	June 1994 Threshold	June 1994 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	5.135			
> CRD pull/put	11.80	11.18	9.69	9.69	9.69			
> Drywell MSIV	7.20	6.82	0.031	0.088	0.094			
> 3A RR Pump	1.38	1.31	0.179	0.367	0.388			
> 3B RR Pump	1.24	1.17	0.201	0.45	0.766			
> Drywell ISI	35.17	33.32	8.317	14.262	20.659			
> Drywell Shielding	14.60	13.83	8.862	9.034	9.11			
> CRD leak test/rebuild	11.85	11.22	4.23	4.528	4.528			
> DW Snubber inspec.	13.76	13.04	1.545	2.055	2.108			
> DW Mn Stm Rel VLV Rep	8.82	8.36	0.204	0.306	0.306			
TOTAL EST. EXPOSURE (above 10 jobs)	116.26	110.14	38.389	45.915	52.784			
Hot Spot Reduction (number of hot spots)	43	40	31	31	31			
Contaminated Area (% of plant)	17.00%	16.00%	17.30%	17.50%	17.50%			
Temporary Alterations (# of >30 days)	<30	17	38	36	37			
Backlog of NWR's	1667	1649	1559	1538	1546			
Backlog of Control Room NWR (Corrective)	11	<6 >2wks	22	26	25			
Total outage/Non-outage CC NWR's			51	48	45			
MOV Commitment								
> U-2 dP tests	5	8	8	8	8			
> U-3 dP tests	27	29	7	7	7			
> U-2 Static Testing	82	82	74	74	74			
> U-3 Static Testing	78	78	47	47	47			
> Operability for high & medium	160	160	141	141	141			
safety significant, low margin vlvs								
Refuel Outage Performance	85.00%	> 85.00%	102.00%	102.00%	99.00%			
Safety System Performance								
* HPCI (INPO)								
> Unit 2	</= 0.025	</= 0.023	0.018	0.017	0.016			
> Unit 3	</= 0.025	</= 0.023	0.043	0.043	0.043			

* LPCI (INPO)								
> Unit 2	</= 0.020	</= 0.019	0	0	0			
> Unit 3	</= 0.020	</= 0.019	0.025	0.024	0.022			
* Emergency A/C (INPO)								
> Unit 2	</= 0.025	</= 0.023	0.025	0.023	0.022			
> Unit 3	</= 0.025	</= 0.023	0.051	0.048	0.048			
* Safety System Failures (NRC)								
> Unit 2								
> Unit 3								
Operator Work Arounds								
> Unit 1	< 10	< 10	1	1	1			
> Unit 2	< 10	< 10	8	8	8			
> Unit 2/3	< 10	< 10	6	6	6			
> Unit 3	< 10	< 10	10	10	10			
> Radwaste	< 10	< 10	TBD	TBD	TBD			
Top 50 Technical Issues	20	20	2	3				
HUMAN PERFORMANCE								
Outage Exposure (Rem)	650.00	585.00	235.652	279.788	309.197			
Non-outage Rem/day (does not incl. outages)	N/A	N/A	1.355	1.362	1.461			
Year end exposure (Rem)			326.041	372.924	407.019			
Rad Worker Events (Level 1,2,3 PIF's)	5	4	1	1	1			
High Rad Area Violations (Level 1,2,3 PIF's)	4	2	2	3	3			
PCE's (>1K dpm/100cm2)	180	160	114	131	141			
Rad Material Violations (Level 1,2,3 PIF's)	6	4	10	12	13			
Shoe Contaminations (< & > 1K/100cm2)	1300	1100	1264	1329	1359			
Personnel Error Events	32	23	10	10	17			
Accident Rate	1.9	1.8	2.75	2.75	2.55			
Reactivity Management	0	0	0	0	0			
Procedure Adherence Events	11	8	2	3	4			
PERFORMANCE MONITORING								
Average Age of PIF Backlog	34 days	< 30 days	32	32	33			
Number of PIF's	1100	1250	1538	1638	1767			
% of PIF's (Lev. 1,2,3) Investigations	12.00%	11.00%	10.00%	9.70%	9.60%			
CAR Completion								
> Overdue responses (> 60 days)	0	0	1	2	0			
> Level A CAR's	0	0	0	0	0			
> Level B CAR's	3	2	1	1	0			
Recurring Problems	2	1	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	0			
> Ratio of NCV's / NOV's	Note 1	Note 1	0.4	0.333	0.286			

QUAD CITIES METRICS (page 1) 4/30/94

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	28.5 Rem		69.7 End of Outage	66.2		
> Outage exposure	825 Rem	498 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	599 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	4	4	≤ 7	≤ 6	≤ 10	≤ 8
> High Rad violations	5	3	0	1	0	1	0
> PCE's	149	209	50/unit	≤ 135	≤ 120	≤ 190	≤ 175
3. Rad material violations	7	1	0	≤ 4	≤ 3	≤ 5	≤ 3
4. Contaminated area	67,800 sq ft	91,860 sq ft (31 %)	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) 4/30/94

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	40	All shoe nonoutage 10/month, outage 25/month	32	30	52	48

QUAD CITIES METRICS (page 3) 4/30/94

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	63	<30	≤ 100		≤ 55	≤ 50
2. Backlog of NWR	915	1597	325 nonoutage	1830		1380	1330
3. Backlog of control room NWR	44	37	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)		38%	90%				
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 0.148 U-1 RCIC 0.005 U2 HPCI 0.052 U-2 RCIC 0.102 EDG 0.016 ++++++++++ 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

QUAD CITIES METRICS (page 4) 4/30/94

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
7. Operator work arounds ***	79	35	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	165		189	186	169	159

QUAD CITIES METRICS (page 5) 4/30/94

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 = 92 Level 3 = 123	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	1173	3000	1300	1500	2600	3000
3. % of PIFS (1,2,3) investigations	9%	4.6%	10% of total	Maintain		Maintain	
4. CAR completion (Level A & B)	14 > 60 days (4 open)	20 > 60 days (0 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) 4/30/94

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	6*(Corrects previous year computer classification error)	30% decrease from 1993 value	12	10	23	20
2. Accident Rate		0.83	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.