

July 26, 1994

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

Mr. D. L. Farrar  
Manager, Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III, Suite 500  
1400 OPUS Place  
Downers Grove, Illinois 60515

Dear Mr. Farrar:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. M89129, M89130, M89131, M89132, M89133, M89134, M89135, M89136, M89137, M89138, M89139, AND M89140)

By letter dated March 29, 1994, and pursuant to 10 CFR 50.54, Commonwealth Edison Company (ComEd) submitted Quality Assurance Topical Report CE-1-A, Revision 65, for NRC approval.

During our review, we identified additional information that is required before we can complete our activities. The enclosed Request for Additional Information has previously been provided to Mr. J. Bauer of your staff and was the subject of a conference telephone call on July 11, 1994.

It is our understanding that the requested information will be submitted by the end of July 1994.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

If there are questions regarding this request, I may be contacted at (301) 504-3019.

Sincerely,

Original signed by John F. Stang for:  
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  
PDR

Enclosure:  
Request for Additional Information

cc w/enclosure:  
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OFC	LA:PDIII-2	PM:PDIII-2	RPEB	D:PDIII-2		
NAME	CMOORE	GDICK:JC	SBLACK	RCAPRA		
DATE	7/26/94	7/26/94 for	7/26/94	7/26/94	1 / 94	1 / 94
COPY	(YES)NO	(YES)NO	YES(NO)	(YES)NO	YES/NO	YES/NO

290044

Mr. D. L. Farrar

cc:

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REQUEST FOR ADDITIONAL INFORMATION

COMMONWEALTH EDISON COMPANY

QUALITY ASSURANCE TOPICAL REPORT CE-1-A, REVISION 65

1. As proposed, the Site Quality Verification Director (SQVD) will report directly to the Site Vice President regarding safety oversight issues.

What provision will be implemented to establish and maintain the required independence of the SQVD to identify and evaluate effective resolution of nuclear oversight concerns?

2. The licensee's submittal also requests revision of the Quality Assurance (QA) Topical Report to include the description of the audit function, currently contained in Section 6.5 of the Technical Specifications. Specifically, the description would be modified to remove the requirements for audits of E.P. and security and their implementing procedures. Additionally, the existing requirement for an outside independent consultant to audit the fire protection equipment and program implementation triennially would be replaced with ComEd's Site Verification Department or Nuclear Oversight Department audits.

Justification for this proposed change to the QA Program Description is based on a re-examination of the governing requirements of 10 CFR Part 50, Appendix B, and the desire to achieve flexibility and more performance based audits.

Although the NRC generally endorses enhanced flexibility and performance based audits, the subject submittal is silent on ComEd's controls which would evaluate program effectiveness and availability of resources. In particular, what provisions will be developed to increase the audit frequency if a decline in performance is detected - particularly if this decline is the result of reduced oversight resources?

3. The proposed change to the topical report also includes an apparent reduction in commitments associated with the function of the offsite and onsite review processes.

Although the submittal generally discusses the alternative use of a cross-disciplinary review determination by the Director of Safety Review, no description of the controls associated with the assurance of independent review of safety-related activities or the decision criteria are provided.