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February 29, 1996

JSP Ltr. #96-0022

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

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Issues Regarding Relocation of Procedure Review/Approval Processes and
Record Retention Controls - Technical Specification Upgrade Program (TSUP)
NRC Docket Nos. 50-237/249 and 50-254/265

- References:
- (a) J. Schrage letter to U.S. NRC, dated September 1, 1995.
 - (b) J. Schrage letter to U.S. NRC, dated September 20, 1995.
 - (c) NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

In References (a) and (b), respectively, Dresden current Technical Specification (CTS) 6.2.B and Quad Cities CTS 6.2.C regarding technical review and control of procedures, and Dresden CTS 6.2.C and Quad Cities CTS 6.2.D regarding temporary changes to procedures, have been proposed for deletion from the TS and relocated to administrative controls. In addition, the requirements in CTS 6.5 regarding record retention has been proposed for deletion from the TS and relocated to administrative controls.

In Reference (c), the NRC staff informed licensees about recent experiences involving the relocation of Technical Specification (TS) administrative controls related to quality assurance issues. As discussed in Reference (c), existing TS typically contain requirements for the processes related to the review and approval of procedures and changes to procedures. It was further discussed in Reference (c) that NRC staff review of license amendments related to the relocation of the procedure review processes and record retention controls can be facilitated by licensee references to a quality assurance plan commitments. Therefore, the purpose of this letter is to notify the NRC staff of Dresden and Quad Cities' commitment for the following actions:

- to administratively control the relocated requirements for Dresden and Quad Cities' procedure review and approval process and record retention requirements;

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- to incorporate the relocated requirements for procedure review and approval processes and record retention in the next update to the ComEd Quality Assurance Program;
- in the interim, any subsequent changes to these provisions would be controlled in accordance with 10 CFR 50.54(a) unless other subsequent changes regarding 10 CFR 50.54(a) are made accordingly.

If further NRC staff guidance is issued subsequent to the approval of the Reference (a) and (b) submittals, that relax NRC staff guidance regarding the commitment to relocate such controls to the Quality Assurance Program and controlling any such changes per 10 CFR 50.54(a), ComEd will consider the issuance of any such NRC staff guidance as acceptance of ComEd's revision to the above commitments; thus, rendering the above commitments obsolete.

If there are any questions regarding this issue, please contact this office.

Sincerely,



J. Stephen Perry
Vice President
BWR Operations

cc: H. J. Miller, Regional Administrator
R. M. Pulsifer, Project Manager - NRR
J. F. Stang, Project Manager - NRR
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