



50-231

UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 27, 1997

Mr. James J. O'Connor
Chairman and Chief Executive Officer
Commonwealth Edison Company
P.O. Box 767
Chicago, Illinois 60690

SUBJECT: REQUEST FOR INFORMATION PURSUANT TO 10 CFR 50.54(f) REGARDING
SAFETY PERFORMANCE AT COMMONWEALTH EDISON COMPANY NUCLEAR STATIONS

Dear Mr. O'Connor:

The purpose of this letter is to require information that will allow the U. S. Nuclear Regulatory Commission (NRC) to determine what actions, if any, should be taken to assure Commonwealth Edison Company (ComEd) can safely operate its six nuclear stations while sustaining performance improvement at each site, as described in more detail below.

Background

The cyclical safety performance of ComEd nuclear stations has long concerned the Commission and NRC staff. In the last 10 years, LaSalle 1/2 were placed on the NRC's watch list from April 1986 to October 1986. Dresden 2/3 were placed on the watch list from June 1987 until December 1988 and were returned to the watch list in January 1992 and remain on the watch list. Zion 1/2 were placed on the watch list from January 1991 until January 1993. Due to declining performance, trending letters were issued to LaSalle 1/2 in January 1994 and June 1994 and to Quad Cities 1/2 in January 1994, June 1994 and January 1995. In addition, as a result of performance concerns discussed during the January 1997 Senior Management Meeting, LaSalle 1/2 and Zion 1/2 are being placed back on the watch list.

The NRC's concerns regarding inconsistent and marginal plant performance at your facilities have been expressed in a number of letters to you associated with the results of Senior Management Meetings and in Chairman Jackson's letter to you dated March 22, 1996. In addition, concerns regarding ComEd's ability to establish lasting and effective programs that result in sustained performance improvement were discussed during meetings between ComEd and the Commission on February 28, 1994, November 16, 1995 and May 13, 1996.

Dresden, Quad Cities and LaSalle had similar weaknesses and their performance did not improve following a major reorganization that took place throughout late 1992 and early 1993. Performance at Zion improved for a while after the plant was removed from the watch list, but the improving trend then slowed or stopped following the extended dual unit outage that ended in Spring 1994. Performance at Byron and Braidwood, the newer ComEd plants, remained consistently better than the other ComEd plants.

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Historically, major apparent weaknesses that led to the poor performance included: (1) lack of effective management attention and application of resources; (2) weak corporate oversight of nuclear operations; (3) poor problem recognition and failure to ensure lasting corrective actions; (4) lack of adequate engineering support; and (5) an inability or reluctance to learn from experiences at ComEd and other utilities.

Beginning in 1993, ComEd began bringing in outside personnel and changed senior and mid-level plant and corporate management and implemented significant organizational changes. Additional focus was placed on oversight of nuclear operations. Comprehensive improvement plans were developed for Dresden, Quad Cities and LaSalle. A major restructuring of the ComEd design engineering function moved most of the resources previously allocated from the corporate office to the sites. Additional focus was placed on management and leadership, accountability, the problem identification and corrective action processes, material condition improvement, work control, and radiation protection. As a result of these and other corporate initiatives, including additional senior management changes in 1996, improvement has been seen in many areas at Dresden and Quad Cities; however while focusing on these facilities, significant performance decline has been observed at both LaSalle and Zion.

The cyclical safety performance history of the ComEd nuclear facilities, as outlined above, raises questions regarding ComEd's ability to operate six nuclear stations while sustaining performance improvement at each site.

Action

The NRC has concluded that it requires information that will allow the NRC to determine what actions, if any, should be taken to assure ComEd can safely operate its six nuclear stations while sustaining improvement at each of the sites. Therefore, you are required, pursuant to Section 182(a) of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f), to submit a response to this letter within 60 days of its receipt. Your response must be written and signed under oath or affirmation.

Please submit the original copy of your response to the NRC Document Control Desk, with a copy to the Director, Office of Nuclear Reactor Regulation, and to the NRC's Region III Administrator.

The following information is required:

- (a) Information explaining why NRC should have confidence in ComEd's ability to operate six nuclear stations while sustaining performance improvement at each site.
- (b) Criteria that you have established or plan to establish to measure performance in light of the concerns identified above and your proposed actions if those criteria are not met.

J. O'Connor

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and your response will be placed in the NRC Public Document Room located at the Gelman Building, 2120 L Street NW., Washington, DC, and in the local public document rooms for your facilities.

Sincerely,

Original signed by:

Hugh L. Thompson, Jr.
Acting Executive Director for Operations

Docket Nos. STN 50-454, STN 50-455, STN 50-456,
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