



July 29, 1997

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Braidwood Units 1 and 2 (NRC Docket Nos. 50-456/457)
Byron Units 1 and 2 (NRC Docket Nos. 50-454/455)
Dresden Units 2 and 3 (NRC Docket Nos. 50-237/249)
LaSalle Units 1 and 2 (NRC Docket Nos. 50-373/374)
Quad Cities Units 1 and 2 (NRC Docket Nos. 50-254/265)
Zion Units 1 and 2 (NRC Docket Nos. 50-295-304)

Supplemental Information Regarding Commonwealth Edison Company's (ComEd) Response to the U.S. Nuclear Regulatory Commission (NRC) Request for Information Pursuant to 10 CFR 50.54(f) Regarding Safety Performance at ComEd

- References:
- (1) Letter from J. J. O'Connor, dated March 28, 1997; Providing ComEd's Response to "Request for Information Pursuant to 10 CFR 50.54(f) Regarding Safety Performance at Commonwealth Edison Company Nuclear Stations."
 - (2) Letter from T. J. Maiman to U.S. NRC dated April 15, 1997; Transmitting Information on ComEd Nuclear Operations Division Performance Indicators.
 - (3) Letter from H. W. Keiser to U.S. NRC dated June 2, 1997 Transmitting Supplemental Information Regarding Commonwealth Edison Company's (ComEd) Response to the U.S. Nuclear Commission (NRC) Request for Information Pursuant to 10CFR50.54(f) Regarding Safety Performance.

Dear Mr. Callan:

In Reference (1), ComEd provided its response to the U.S. Nuclear Regulatory Commission (NRC) request for information pursuant to 10 CFR 50.54(f) regarding safety performance at ComEd. We provided under separate cover, via Reference (2), information regarding the performance indicators that ComEd selected to measure its performance across the six nuclear stations. Also included were the definitions and threshold values for each specific indicator. Reference (3) provided updated information regarding threshold values and goals for several Performance Indicators.

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The purpose of this letter is to inform you of additional changes that we are making. These changes are a result of the monthly performance review meeting that I have been holding with the Nuclear Operations Division (NOD) Senior Leadership Committee (SLC). We are making changes to the definitions of five indicators. The specific changes are as follows:

- Indicator C4 - Temporary Plant Alteration definition: 'The total number of temporary alterations (Tmods). Temporary alterations (modifications) are a planned change (non-permanent) to the fit, form or function of any operable system, component or circuit that does not conform to approved design drawings or other approved design documents.' This change was made to implement a new temporary alteration control process across all six sites.
- Indicator C5 - Failed Technical Specification Pump and Valve Surveillances definition: 'The number of Technical (TS) pump and valves including Inservice Testing (IST), which do not meet the TS or IST surveillance required acceptance criteria.' This change was made to clarify that we wanted to count the actual number of failed components not the number of failed surveillance tests.
- Indicator C9 - Percent Rework definition: 'The performance of any physical maintenance task which results in a loss of time or money within a twelve month period. The total rework divided by the total number of Work Request (WR) work in the power block that is greater than Electronic Work Control System (EWCS) status 50 and not equal to status 95. (Percent for the 3 previous months with 1 month in arrears.)' This change was made to accommodate the fluctuating work package completion rate and the inherent delay in work package investigations for rework.
- Indicator C11 - Engineering Requests definition: 'Engineering Requests which are assigned a priority level of A or B. A and B priority Engineering Requests are tied to plant milestones and significant issues.' This change was made to clarify that we wanted to count those Engineering Requests which have assigned due dates. This allows Indicator C11 - Engineering Requests and Indicator C12 - Engineering Requests Overdue, to be comparable.
- Indicator C12 - Engineering Requests Overdue definition: 'The number of overdue Engineering Requests which are assigned a priority level of A or B. A and B priority Engineering Requests are tied to plant milestones and significant issues.' This change was made to clarify that we wanted to count those overdue Engineering Requests which have assigned due dates. This allows Indicator C11 - Engineering Requests and Indicator C12 - Engineering Requests Overdue, to be comparable.

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As you are aware, certain ComEd NOD indicators do not have specific threshold values associated with them at this time. A threshold value will be selected following trending the indicator for a period of time. We will continue to communicate any such changes to the indicators in written correspondence as well as in our routine performance status meetings.

Sincerely,



Harold W. Keiser
Vice President
Chief Nuclear Operating Officer

cc: H. Thompson, Deputy Director for NRR
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Quad Cities, Senior Resident Inspector
Zion, Senior Resident Inspector
Office of Nuclear Facility Safety - IDNS
DCD - Licensing