

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION III 801 WARRENVILLE ROAD LISLE, ILLINOIS 60532-4351

August 29, 1997

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See
Reports

Thomas J. Maiman
Senior Vice President,
Nuclear Operations Division
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place
Downers Grove, IL 60515

SUBJECT:

STATUS MEETING ON THE PERFORMANCE OF COMMONWEALTH EDISON

COMPANY'S NUCLEAR OPERATIONS DIVISION

Dear Mr. Maiman:

This refers to the meeting conducted at the NRC Region III office in Lisle, Illinois, on August 5, 1997. The purpose of this meeting was to discuss Commonwealth Edison Company (ComEd) Nuclear Operations Division's performance as it relates to actions ComEd has taken in response to the NRC's January 27, 1997, 10 CFR 50.54(f) letter regarding safety performance at ComEd's nuclear facilities. The meeting also focused on the performance indicators that ComEd is using to monitor and assess performance. Attendees at the meeting are listed in Enclosure 1. Enclosure 2 is a copy of your presentation handout.

Your presentation provided a status of the four focus areas from your response to the 10 CFR 50.54(f) letter. These areas included: (1) focus on safe operations; (2) leverage Nuclear Operations Division's size; (3) adequate financial and human resources; and (4) oversight, assessment, and monitoring. Of the 341 total action items from the 10 CFR 50.54(f) letter, 120 items have been closed.

You also discussed the results of ComEd's monitoring of the 7 NRC or World Association of Nuclear Operators (WANO) performance indicators and the 18 ComEd specific performance indicators. Your assessment of the indicators has led you to conclude that the ComEd nuclear facilities have areas of good performance, areas of improved performance, and areas that need improvement.

Our staff had a number of questions regarding the uniform application of the performance indicators among the six ComEd nuclear facilities as well as the usefulness of some of the indicators as a valid measure of performance. Indicators questioned included operator workarounds, overtime hours, overdue corrective actions, percent rework, engineering requests, and temporary alterations. For example, at Zion, the percent rework



performance indicator did not include preventive maintenance tasks, surveillance tests, and modifications, while the overtime indicator only tracks paid overtime, tracks station overtime as a whole instead of by department, and does not include contractor overtime. We will continue to evaluate the application of the performance indicators in subsequent inspections and status meetings.

Your performance indicator assessment was summarized by Mr. Harry Keiser as representing, in ComEd's view, evidence of improved performance to date.

Based on our discussions you agreed to discuss the following topics during the next status meeting:

- (1) The NRC staff is interested in an overview presentation on the ComEd budget allocation process and how budget decisions are made over the course of the year.
- (2) An overview of the status of the Maintenance Rule Performance Indicators for each of the stations.
- (3) The functions and activities of the NOD Nuclear Oversight and Site Quality Verification Groups as they relate to providing independent and consistent oversight of the performance of each site and the Nuclear Division as a whole.
- (4) An interpretive report on each of the performance indicators to understand what the performance indicators are telling ComEd.

In response to your invitation for the NRC to perform an inspection at the Downer's Grove corporate office, we plan to schedule several visits to assess implementation of your commitments in response to the 10 CFR 50.54(f) letter.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 10, Code of Federal Regulations, a copy of this letter, and its enclosures, will be placed in the NRC's Public Document Room.

Thomas J. Maiman

If you have any questions regarding this meeting or if our understanding of actions you are taking, as discussed above, differs from yours, please contact me at (630) 829-9657.

Sincerely,

15/ A. B. Beach

A. Bill Beach Regional Administrator

Docket Nos: 50-237; 50-249; 50-254;

50-265; 50-373; 50-374; 50-295; 50-304; 50-456; 50-457; 50-454; 50-455

Enclosures:

1. Attendance List

2. Licensee Presentation

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D. A. Sager, Vice President,

Generation Support

H. W. Keiser, Chief Nuclear

Operating Officer

H. G. Stanley, Site Vice President, Braidwood

K. Graesser, Site Vice President, Byron

J. S. Perry, Site Vice President, Dresden

W. T. Subalusky, Jr., Site Vice

President, LaSalle

E. Kraft, Site Vice President, Quad Cities

J. H. Mueller, Site Vice President, Zion

L. W. Pearce, Station Manager, Quad Cities

C. C. Peterson, Regulatory Affairs

Manager, Quad Cities

I. Johnson, Acting Nuclear

Regulatory Services Manager

Richard Hubbard

Nathan Schloss, Economist

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Chairman, Illinois Commerce

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J. R. Bull, Vice President, General &

Transmission, MidAmerican Energy Company

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T. Nauman, Station Manager, Dresden Unit 1

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F. Spangenberg, Regulatory Assurance

Manager, Dresden

R. Starkey, Plant General Manager, Zion

R. Godley, Regulatory Assurance

Supervisor, Zion

Mayor, City of Zion

State Liaison Officer, Wisconsin

K. Kofron, Station Manager, Byron

D. Brindle, Regulatory Assurance

Supervisor, Byron

T. Tulon, Station Manager, Braidwood

T. Simpkin, Regulatory

Assurance Supervisor, Braidwood

F. Dacimo, Plant General Manager, LaSalle

P. Barnes, Regulatory Assurance

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ATTENDANCE AT THE AUGUST 5, 1997 MEETING BETWEEN THE NRC AND COMED

COMED ATTENDEES

T. Maiman
Chief Nuclear Officer/Executive Vice President
H. Keiser
Chief Nuclear Operating Officer/Vice President

D. Sager Vice President, Generation Support

J. Hosmer
 J. Brons
 Vice President, Engineering
 Vice President, Nuclear Support
 V. Brown
 Vice President, Human Resources

I. Johnson Licensing Director

M. Pavey Regulatory Performance Administrator
D. Cooper NOD Corrective Actions Manager

K. Karr Director, Performance Improvements (Peer Groups)

G. Schwartz Corporate Assessment Manager
L. Waldinger Nuclear Oversight Manager

J. Able Corporate Services

D. Farrar Manager, Nuclear Services

D. Jenkins Senior Counsel
D. Chrzanowski Nuclear Licensing

G. Wald Corporate Communications

J. Reynolds Nuclear Operating Committee (NOC)- Board of Directors (BOD)

D. Evans Laison NOC-BOD

D. Smith Nuclear Communications

NRC ATTENDEES

A. Beach Regional Administrator

R. Zimmerman Associate Director for Reactor Projects, NRR
E. Adensam Deputy Director, Division of Reactor Projects, NRR

R. Capra Director, Project Directorate III-2, NRR G. Tracy Senior Regional Coordinator, OEDO

G. Grant Director, Division of Reactor Projects (DRP), Region III

M. Dapas

Acting Deputy Director, DRP, Region III

W. Kropp

Chief, Projects Branch 1, DRP, Region III

Chief, Projects Branch 3, DRP, Region III

M. Galloway Acting Chief, Projects Branch 2, DRP, Region III

G. Dick Project Manager, NRR

M. Leach Chief, Operator Licensing Branch, DRS, Region III

M. Ring Chief, Engineering Branch, DRS, Region III

A. Dauginas Public Affairs Officer, Region III

R. Lerch Project Engineer, Projects Branch 1, DRP, Region III
P. Pelke Reactor Engineer, Projects Branch 6, DRP, Region III

OTHER ATTENDEES

Reporter, Chicago Sun-Times Enviro Law and Policy Center Enviro Law and Policy Center C. Nicodemas J. Seidita

B. McClellan N. Howey

Assistant Manager, Illinois Department of Nuclear Safety Reporter, WBBM Radio News C. Dellimore