

To: Document Control Desk
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October 8, 1997

ComEd

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2
Byron Nuclear Power Station Units 1 and 2
Dresden Nuclear Power Station Units 2 and 3
LaSalle Nuclear Power Station Units 1 and 2
Quad Cities Nuclear Power Station Units 1 and 2
Zion Nuclear Power Station Units 1 and 2

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(17) Regarding Safety Performance at ComEd

NRC Docket Nos. 50-456/457

NRC Docket Nos. 50-454/455

NRC Docket Nos. 50-237/249

NRC Docket Nos. 50-373/374

NRC Docket Nos. 50-254/265

NRC Docket Nos. 50-295-304

- 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 10 CFR 50.54(f) Regarding Safety Performance.
 - (4) Letter from H.W. Keiser to U.S. NRC dated July 29, 1997, Transmitting Supplemental Information Regarding Commonwealth Edison Company's (ComEd) Response to the U.S. Nuclear Commission (NRC) Request for Information Pursuant to 10 CFR 50.54(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. Under separate cover, via Reference (2), information regarding the performance indicators that ComEd selected to measure its

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performance across the six nuclear stations was provided. Also included were the definitions and threshold values for each specific indicator. Reference (3) and (4) provided updated information regarding threshold values and goals for several Performance Indicators.

The purpose of this letter is to inform you of additional changes that are being made. These changes are a result of assessments performed to validate the NOD Performance Indicators and the NOD Performance Indicator implementation process, and the experience gained since the performance monitoring program was implemented.

The changes being made are as follows:

- 1) A revision to the variance process relative to the actions taken when an indicator is determined to be in variance;
- 2) Revisions to the definitions of two indicators;
- 3) Changes to the threshold values for two of the indicators;
- 4) Selection of thresholds for six indicators that are trended; and
- 5) Deletion of three indicators

A Revision To The Variance Process Relative To The Actions Taken When An Indicator Is Determined To Be In Variance

- If a performance threshold is not met, a "variance report" describing the preliminary cause of the deviation is presented as part of the next Management Review Meeting. This report includes a description of the actions underway or planned to improve performance.

This revision changed cause to preliminary cause to clarify that a root cause investigation was not required to be performed.

- If a performance threshold is not achieved for two consecutive months, the Site Vice President's variance report shall be submitted to the BWR or PWR Vice President and shall include a written action plan to bring performance back into conformity with the threshold. The BWR Vice President, PWR Vice President or Site Vice President may direct additional specific action, including work standdowns, implementation of special work controls, appointment of root cause or investigation teams, assignment of additional personnel, special monitoring, or other appropriate actions up to and including plant shutdown. If the BWR/PWR Vice Presidents and Site Vice President determine that the cause of the deviation is not tied to deficient performance or that the deviation is acceptable for a period of time, they may reset the performance threshold or defer action for that limited time. Such a decision shall be reported to the CNO.

The revisions made include changing the title of CNOO to BWR and PWR Vice Presidents, and deleting the monthly SVP report reference. The variance report and monthly SVP report are used as same report.

- If (1) a performance threshold has not been met for consecutive three months, or (2) responsive action has achieved insufficient progress over a sustained period, the BWR Vice President or PWR Vice President shall report this to the CNO. The CNO, BWR Vice President and PWR Vice President shall review the performance and determine if current action plans are addressing the performance issues. If the CNO, BWR Vice President and PWR Vice President determine that current actions address the performance issues, then they may defer action for a limited time. If the CNO, BWR Vice President

and PWR Vice President determine current action plans do not address the performance issues, then an assessment team shall be established reporting to the BWR or PWR Vice President. This team shall assess causes and recommend: (a) further actions to restore performance; and (b) other actions that may be appropriate to the seriousness of the problem, such as standdown, staff augmentation, increased oversight, modified operations or shutdown. The results of the team's evaluation and recommended actions shall be reported in the regular briefings of the NOC of the Board of Directors, which includes ComEd's Chairman/CEO, and President. The progress and success of this plan shall be reported at each Management Review Meeting for the affected station. The NOC of the Board shall also be notified when performance has been returned to conformity with the threshold.

The revisions made include changing the title of CNOO to BWR and PWR Vice President and including the option for the CNO and BWR/PWR Vice Presidents to review actions plans and current performance and then determine if an assessment team is necessary to evaluate the adverse performance.

Revisions To The Definitions

- Indicator I6 - Safety System Performance definition change: "The sum of the unavailabilities of the trains in the safety system divided by the number of trains in the system. (Average for the month)".

The revision changed component to train. This change was made to be consistent with the terminology used in the INPO definition for Safety System Performance

- Indicator C4 - Temporary Modifications (T-Mods) definition change: "The total number of T-Mods. T-Mods are a planned change (non-permanent) to the fit, form or function of any operable system, structure, component or circuit that does not conform to approved design drawings or other approved design documents."

The revision changed the name of the indicator from Temporary Alteration to Temporary Modifications. This change was made to be consistent with the terminology used in the temporary modification control process across all six sites.

Changes To The Threshold Values

- Indicator C1 - Operator Workarounds threshold change: "Greater than 10% deviation from the Site Work Down Curve or three Operator Workarounds (whichever is greater) over site's monthly goal on the Work Down Curve."

The revision added "three Operator Workarounds (whichever is greater)". This change was made to normalize the required action for sites with Work Down Curves that were more aggressive.

- Indicator C4 - Threshold change: "Greater than 10% deviation from the Site Work Down Curve or three T-Mods (whichever is greater) over site's monthly goal on the Work Down Curve".

The revision added "three T-Mods (whichever is greater)". This change was made to normalize the required action for sites with Work Down Curves that were more aggressive.

Selection Of Thresholds

- Indicator C5 - Failed Technical Specification Pump and Valve Surveillances threshold change: "Greater than 2 per month."
- Indicator C6 - Unplanned Entries into LCO's threshold change: "Greater than 2 per month."
- Indicator C11 - Engineering Requests threshold change: "Greater than 10% deviation from the Site Work Down Curve."
- Indicator C12 - Engineering Requests Overdue threshold change: "Greater than 5 per month."
- Indicator C13 - Corrective Action Items (CAI) threshold change: "A 25% deviation, higher or lower, than the site's previous six month rolling average."
- Indicator C14 - Overdue Corrective Actions threshold change: "Greater than or equal to 5 per month." This change was made to monitor performance on a more frequent basis.
- Indicator C16 - Number of Problem Identification Forms (PIFs) Written threshold change. "On a monthly basis, either less than 160 PIFs or more than 600 PIFs written per month."

Deletion Of Indicators

- Indicator C10 - Outage Work Requests

Data collected for this indicator has not provided quality information to monitor the sites performance, therefore, it is being deleted.

- Indicator C17 - Overtime Hours

Data collected for this indicator has not provided quality information to monitor the sites performance, therefore, it is being deleted.

- Indicator C18 - Cited NRC Violations

The lagging nature of the indicator inhibited the ability to monitor performance on a real time basis, therefore, it is being deleted.

We will continue to communicate any such changes to the indicators in written correspondence, as well as in our routine performance status meetings.

Sincerely,



Robert J. Manning
Executive Vice President

cc: H. Thompson, Deputy Director for NRR
A.B. Beach, Regional Administrator RIII
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