



January 7, 1998

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

Subject: Braidwood Station Units 1 and 2 (NRC Docket Nos. 50-456/457)  
Byron Nuclear Power Station Units 1 and 2 (NRC Docket Nos. 50-454/455)  
Dresden Station Units 2 and 3 (NRC Docket Nos. 50-237/249)  
LaSalle Station Units 1 and 2 (NRC Docket Nos. 50-373/374)  
Quad Cities Station Units 1 and 2 (NRC Docket Nos. 50-254/265)  
Zion Station 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(17) 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 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.
- (5) Letter from R.J. Manning to U.S. NRC dated October 8, 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.
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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 performance across the six nuclear stations was provided. Also included were the definitions and threshold values for each specific indicator. References (3), (4), and (5) 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 are being made. These changes are a result of assessments performed to validate the Nuclear Generating Group (NGG) Performance Indicators and the NGG Performance Indicator implementation process, and the experience gained since the performance monitoring program was implemented.

The changes being made are as follows:

- 1) Revisions to the definitions of three indicators.
- 2) Changes to the threshold values for two indicators.

#### **Revisions To The Definitions**

- Indicator C-1 - "Operator Workarounds" definition change:

An equipment or program deficiency that provides an obstacle to safe plant operations by requiring Operations personnel to take compensatory actions to comply with procedures, design requirements, or technical specifications. If compensatory actions have been proceduralized, but were not intended as part of the equipment operating design, the issue is an OWA. (# opened during the month) (# closed during the month) (total # at the end of the month).

The revision clarifies the definition of an Operator Work Around.

- Indicator C-2 - "Out Of Service Errors" definition change:

1. All OOS errors designated as a Significant Condition Affecting Quality (SCAQ), or
2. All PIFs written after the master out-of-service card is placed for an OOS, or
3. All OOS configurations discovered that:
  - a) would have jeopardized personnel safety if the work had proceeded, or
  - b) had the potential to damage isolated or nearby equipment, or
  - c) did not match the OOS configuration stated on the OOS checklist. (total during the month)

The revision expands the definition to include additional events that are considered Out of Service Errors.

- C.9 Percent Rework

The reperformance of any physical maintenance task and any maintenance task prior to return-to-service (RTS). This includes repeat maintenance for identical problems with identical corrective actions that was performed in the last 12 months after RTS on the same equipment or component and poorly performed maintenance that causes rework.

This revision clarifies the work that is included as part of the indicator and maintains consistency with the implementing procedure or rework reduction.

#### Changes To The Threshold Values

- Indicator C-6 - Threshold change: Braidwood and Byron: Greater than six per month per site. Dresden, LaSalle, Quad Cities and Zion: Greater than 2 per month per site.

The revision allows higher thresholds for two sites based upon their more recent Tech Specs. After LaSalle is restarted, consideration may be given to reviving its threshold for the same reason.

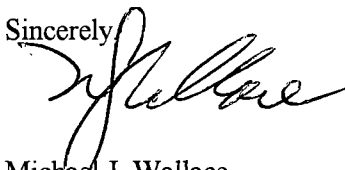
- Indicator C-16 - Threshold change: Less than 160 PIFs written per month per site.

The revision deleted the upper limit of greater than 600.

This change was made to avoid discouraging the writing of PIFs.

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

Sincerely,



Michael J. Wallace  
Senior Vice President

cc: H. Thompson, Deputy Director for NRR  
A.B. Beach, Regional Administrator RIII  
R. Capra, Project Directorate - NRR  
G. Dick, Byron/Braidwood Project Manager - NRR  
J. Stang, Dresden Project Manager - NRR  
D. Skay, LaSalle County Project Manager - NRR  
R. Pulsifer, Quad Cities Project Manager - NRR  
C. Shiraki, Zion Project Manager - NRR  
Braidwood Senior Resident Inspector

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