

# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 24, 1998

50-237/249

Mr. Oliver D. Kingsley President, Nuclear Generation Group Commonwealth Edison Company ATTN: Regulatory Services Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove. IL 60515

Dear Mr. Kingsley:

On July 14 and 15, 1998, NRC senior managers met to evaluate nuclear safety performance of operating reactors, fuel cycle facilities, and other materials licensees. The NRC conducts this meeting periodically to determine if the safety performance of various licensees exhibits sufficient weaknesses to warrant increased NRC attention or if it is trending adversely and requires steps be taken to communicate concerns to the utility's president or board of directors. At the July 1998 Senior Management Meeting (SMM), the Zion Nuclear Power Station, the Dresden Nuclear Power Station, the LaSalle County Nuclear Power Station and the Quad Cities Nuclear Power Station were discussed.

On the basis of our discussions, we concluded that: (1) the Zion Nuclear Power Station should be administratively removed from the NRC Watch List, (2) the Dresden Nuclear Power Station has demonstrated sustained improvement sufficient to warrant removal from the NRC Watch List category that requires increased attention from both NRC headquarters and Region III, and (3) the LaSalle County Nuclear Power Station remains on the NRC Watch List as a Category 2 plant. Also, we could not conclude that the adverse trend had been arrested at Quad Cities due to the limited operational data since the last SMM.

Plants removed from the Watch List have taken effective actions to correct identified problems and implement programs for improved performance. Plants in Category 2 have been identified as having weaknesses that warrant increased NRC attention until the licensee demonstrates a period of improved performance. A summary of NRC discussions related to ComEd, the Zion Nuclear Power Station, the Dresden Nuclear Power Station, the LaSalle County Nuclear Power Station and the Quad Cities Nuclear Power Station follows:

## <u>ComEd</u>

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The senior managers focused on the currently limited measurable progress from ComEd's improvement initiatives. Since the last SMM: (1) LaSalle remained shut down; (2) Dresden safely demonstrated dual-unit operations, although it experienced several reactor scrams; and (3) Quad Cities just recently restarted following an extended outage. While it is too early for outcome performance indicators to show that operational performance is improving as a result of the Strategic Reform Initiatives, the senior managers expressed greater confidence in your processes for monitoring and addressing indications of cyclical performance.

# Zion Nuclear Generating Station

Following the January 1998 SMM, the ComEd Board of Directors decided to permanently cease further operation of the plant. Certifications to the NRC of the permanent cessation of operation and permanent removal of fuel from the vessels, in accordance with 10 CFR 50.82(a)(1)(i) and (ii), were filed on February 13 and March 9, 1998. Based upon statements in these certifications, it was concluded that the Zion Nuclear Power Station should be administratively removed from the Watch List.

#### Dresden Nuclear Power Station

The senior managers considered the Watch List removal matrix in determining the appropriate agency response. Because of the high number of scrams since the last SMM, the region concluded that sustained plant performance was not demonstrated. However, the region noted that despite the relatively high number of scrams, plant performance has improved substantially based on other indicators such as improved conduct of operations and plant material condition. Operators have performed well during the scrams and subsequent startups.

The senior managers focused on the six scrams that occurred since December 1997 and debated potential insights that could be drawn concerning the overall performance of the site. The senior managers noted that safe dual-unit operations had been achieved since the last SMM and that the scrams were generally the result of historical problems. It was noted that operator performance during the scrams was good. While the number of scrams was high, plant equipment responded as designed during the scrams, minimizing the challenge to operators. In addition, due to the general lack of equipment problems during these transients, NRC senior managers gained greater confidence in the reliability of mitigating equipment. The senior managers concluded that, contrary to the initial view expressed in the Watch List removal matrix, Dresden had sufficiently demonstrated sustained plant performance to meet the removal matrix criteria.

The senior managers discussed risk insights associated with Dresden as reflected by the plant's risk analyses. These discussions focused on equipment reliability experienced during scrams, HPCI system reliability, and recent improvements made to the feedwater level control system. The senior managers determined that the level of risk resulting from the reactor trips experienced by Dresden during the period was minimal.

The senior managers deliberated on Dresden's improved performance in conjunction with the agency's concerns over ComEd system-wide performance and the performance trends at the other individual ComEd nuclear facilities, specifically Quad Cities. While system-wide performance remained an area of NRC focus, the senior managers concluded that ComEd's corporate support and oversight of Dresden was adequate to support continued sustained performance. In addition, the senior managers concluded that the site had individually achieved a level of performance to support removal from the Watch List during the last twelve months. Lastly, the senior managers expressed greater confidence in ComEd's ability to monitor and address cyclical performance.

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The senior managers decided that, overall, ComEd had taken effective action to correct identified problems and improve operational safety performance at Dresden, and that the site had individually achieved a level of performance that supported removal from the Watch List. Therefore, the NRC has determined that an enhanced level of regulatory monitoring is no longer warranted.

# LaSalle County Station

The senior managers considered the Watch List removal matrix in determining the appropriate agency response to the identified performance concerns. Although the licensee is making significant progress toward resolving historical performance problems, particularly in correcting material deficiencies, improvements are still in the early stages and have not been in place long enough to be either assessed or self-sustaining. Although the licensee has made substantial progress towards preparing both units for restart, desired improvements in operator performance, including procedure adherence, have not yet been fully demonstrated and the ongoing procedure upgrade program has not been completed. Consistent and effective root cause analysis still relies heavily on oversight organizations. Substantial non-outage maintenance backlogs exist. Both units have remained shut down since September 1996 and thus sustained, successful plant performance has not yet been demonstrated. Also, as a result of the extended outage on both units, performance indicators provide limited insights regarding performance trends.

The senior managers decided that LaSalle would remain a Watch List Category 2 facility.

#### Quad Cities Nuclear Power Station

NRC senior managers noted observations of mixed performance since the last SMM. Both units at Quad cities restarted at the end of May after a long dual-unit outage to reestablish Appendix R safe-shutdown paths. Subsequent to the restart there were several power reductions and two scrams due, in part, to material condition issues. While operational performance demonstrated improvement since the extended outage, operations personnel were involved in several missed technical specification surveillances. Also, while the material condition of the plant improved and the maintenance backlog was reduced, there were maintenance errors and concerns with emergency diesel generator reliability.

The Quality and Safety organization took an active role in improving the performance of the corrective action program; however, a lack of rigor resulted in the licensee's failure to address some long-standing issues. It was also noted that the engineering organization appeared to be burdened by efforts to resolve Appendix R issues. The senior managers also noted that while compensatory actions had been taken to reduce the risk of core damage due to a fire, the long-term corrective actions are still underway and remain an area of NRC focus.

The sense of NRC senior managers was that Quad Cities performance was mixed with slow improvement in some areas. While a decline in some performance indicator trends was detected, the senior managers determined that there were not sufficient operational

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data or inspection insights available to assess the overall performance trend at Quad Cities. Furthermore, it was not clear that ComEd's efforts had resulted in measurable performance improvements at Quad Cities. Consequently, the senior managers determined that it would be prudent to observe Quad Cities performance for a longer period of time to assess the performance trend. The senior managers could not conclude that the adverse trend had been arrested at Quad Cities due to the limited operational data since the last SMM.

Dr. Carl J. Paperiello, the Acting NRC Region III Administrator, has discussed the bases for our conclusions regarding the Zion Nuclear Generating Station, the Dresden Nuclear Power Station, the LaSalle County Nuclear Power Station, and the Quad Cities Nuclear Power Station with members of your staff.

An NRC Commission meeting, open to the public, is scheduled to be held in the Commissioners' Conference Room in Rockville, Maryland, on July 29, 1998, to review the results of the latest meeting of the NRC senior managers.

If you have any questions regarding this matter, do not hesitate to call me.

Sincerely, Callan

Executive Director for Operations

Docket Nos.: 50-237; 50-249; 50-373; 50-374; 50-254; 50-265; 50-295; 50-304

License Nos.: DPR-19; DPR-25; NPF-11; NPF-18; DPR-29; DPR-30; DPR-39; DPR-48

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CC:

Mr. David Helwig Senior Vice President Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 900 Downers Grove, IL 60515

Michael I. Miller, Esquire Sidley and Austin One First National Plaza Chicago, Illinois 60603

Regional Administrator, Region III U.S. Nuclear Regulatory Commission 801 Warrenville Road Lisle, Illinois 60532-4351

Illinois Department of Nuclear Safety Office of Nuclear Facility Safety 1035 Outer Park Drive Springfield, Illinois 62704

Document Control Desk-Licensing Commonwealth Edison Company 1400 Opus Place, Suite 400 Downers Grove, Illinois 60515

Mr. William P. Poirier, Director Westinghouse Electric Corporation Energy Systems Business Unit Post Office Box 355, Bay 236 W. Pittsburgh, Pennsylvania 15230

Joseph Gallo Gallo & Ross 1250 Eye St., N.W., Suite 302 Washington, DC 20005

Howard A. Learner Environmental law and Policy Center of the Midwest 203 N. LaSalle Street Suite 1390 Chicago, Illinois 60601 U.S. Nuclear Regulatory Commission Byron Resident Inspectors Office 4448 N. German Church Road Byron, Illinois 61010-9750

Ms. Lorraine Creek RR 1, Box 182 Manteno, Illinois 60950

Chairman, Ogle County Board Post Office Box 357 Oregon, Illinois 61061

Mrs. Phillip B. Johnson 1907 Stratford Lane Rockford, Illinois 61107

George L. Edgar Morgan, Lewis and Bochius 1800 M Street, N.W. Washington, DC 20036

Attorney General 500 S. Second Street Springfield, Illinois 62701

Commonwealth Edison Company Byron Station Manager 4450 N. German Church Road Byron, Illinois 61010-9794

Commonwealth Edison Company Site Vice President - Byron 4450 N. German Church Road Byron, Illinois 61010-9794

U.S. Nuclear Regulatory Commission Braidwood Resident Inspectors Office RR 1, Box 79 Braceville, Illinois 60407 Mr. Ron Stephens Illinois Emergency Services and Disaster Agency 110 E. Adams Street Springfield, Illinois 62706

Chairman

Will County Board of Supervisors Will County Board Courthouse Joliet, Illinois 60434

Commonwealth Edison Company Braidwood Station Manager RR 1, Box 84 Braceville, Illinois 60407

Ms. Bridget Little Rorem Appleseed Coordinator 117 N. Linden Street Essex, Illinois 60935

Commonwealth Edison Company Site Vice President - Braidwood RR 1, Box 84 Bracemille, IL 60407

Commonwealth Edison Company Site Vice President - Dresden 6500 N. Dresden Road Morris, Illinois 60450-9765

Commonwealth Edison Company Dresden Station Manager 2605 N. 21st Road Marseilles, Illinois 61341-9756

U.S. Nuclear Regulatory Commission Dresden Resident Inspectors Office 6500 N. Dresden Road Morris, Illinois 60450-9766

William D. Leach Manager - Nuclear MidAmerican Energy Company 907 Walnut Street P.O. Box 657 Des Moines, Iowa 50303 Vice President - Law and MidAmerican Energy Company Regulatory Affairs One River Center Place 106 E. Second Street P.O. Box 4350 Davenport, Iowa 52808

Chairman Rock Island County Board of Supervisors 1504 3rd Avenue Rock Island County Office Bldg. Rock Island, Illinois 61201

Chairman Grundy County Board Administration Building 1320 Union Street Morris, Illinois 60450

Commonwealth Edison Company Quad Cities Station Manager 22710 206th Avenue N. Cordova, Illinois 61242-9740

Commonwealth Edison Company Site Vice President - Quad Cities 22710 206th Avenue N. Cordova, Illinois 61242-9740

U.S. Nuclear Regulatory Commission Quad Cities Resident Inspectors Office 22712 206th Avenue N. Cordova, Illinois 61242

Phillip P. Steptoe, Esquire Sidley and Austin One First National Plaza Chicago, Illinois 60603

Assistant Attorney General 100 W. Randolph Street, Suite 12 Chicago, Illinois 60601 U.S. Nuclear Regulatory Commission LaSalle Resident Inspectors Office 2605 N. 21st Road Marseilles, Illinois 61341-9756

Chairman LaSalle County Board of Supervisors LaSalle County Courthouse Ottawa, Illinois 61350

Chairman Illinois Commerce Commission Leland Building 527 E. Capitol Avenue Springfield, Illinois 62706

Commonwealth Edison Company LaSalle Station Manager 2601 N. 21st Road Marseilles, Illinois 61341-9757

Commonwealth Edison Company Site Vice President - LaSalle 2601 N. 21st Road Marseilles, Illinois 61341-9757

Robert Cushing Chief, Public Utilities Division Illinois Attorney General's Office 100 W. Randolph Street Chicago, Illinois 60601

Dr. Cecil Lue-Hing Director of Research and Development Metropolitan Sanitary District of Greater Chicago 100 E. Erie Street Chicago, Illinois 60611

Mayor of Zion Zion, Illinois 60099

U.S. Nuclear Regulatory Commission Zion Resident Inspectors Office 105 Shiloh Blvd. Zion, Illinois 60099 Commonwealth Edison Company Site Vice President - Zion 101 Shiloh Blvd. Zion, Illinois 60099-2797

Commonwealth Edison Company Zion Station Manager 101 Shiloh Blvd. Zion, Illinois 60099-2797

Mr. Michael J. Wallace Nuclear Services Senior Vice President Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 900 Downers Grove, IL 60515

Mr. Gene H. Stanley PWR's Vice President Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 900 Downers Grove, IL 60515

Mr. Steve Perry BWR's Vice President Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 900 Downers Grove, IL 60515

Mr. Dennis L. Farrar Regulatory Services Manager Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

Ms. Irene Johnson, Licensing Director Nuclear Regulatory Services Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515 Commonwealth Edison Company Reg. Assurance Supervisor - Byron 4450 N. German Church Road Byron, Illinois 61010-9794

Commonwealth Edison Company Reg. Assurance Supervisor - Braidwood RR 1, Box 84 Braceville, Illinois 60407

Commonwealth Edison Company Reg. Assurance Supervisor - Dresden 2605 N. 21st Road Marseilles, Illinois 61341-9765

Commonwealth Edison Company Reg. Assurance Supervisor - Quad Cities 22710 206th Avenue N. Cordova, Illinois 61242-9740

Commonwealth Edison Company Reg. Assurance Supervisor - LaSalle 2601 N. 21st Road Marseilles, Illinois 61341-9757

Commonwealth Edison Company Reg. Assurance Supervisor - Braidwood 101 Shiloh Blvd. Zion, Illinois 60099-2797

Mr. Bill Franz (5) Environmental Review Coordinator 77 W. Jackson Blvd. Chicago, Illinois 60604-3590

Richard Hubbard MHB Technical Associates 1723 Hamilton Avenue Suite K San Jose, Ca. 95125

State Liaison Officer State of Wisconsin Div of Emergency Government 2400 Wright Street P O Box 7865 Madison Wi 53707-7865 Mr. David Helwig Senior Vice President Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 900 Downers Grove, IL 60515

Michael I. Miller, Esquire Sidley and Austin One First National Plaza Chicago, Illinois 60603

Regional Administrator, Region III U.S. Nuclear Regulatory Commission 801 Warrenville Road Lisle, Illinois 60532-4351

Illinois Department of Nuclear Safety Office of Nuclear Facility Safety 1035 Outer Park Drive Springfield, Illinois 62704

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George L. Edgar Morgan, Lewis and Bochius 1800 M Street, N.W. Washington, DC 20036

Attorney General 500 S. Second Street Springfield, Illinois 62701

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U.S. Nuclear Regulatory Commission Braidwood Resident Inspectors Office RR 1, Box 79 Braceville, Illinois 60407 Mr. Ron Stephens Illinois Emergency Services and Disaster Agency 110 E. Adams Street Springfield, Illinois 62706

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Commonwealth Edison Company Site Vice President - Dresden 6500 N. Dresden Road Morris, Illinois 60450-9765

Commonwealth Edison Company Dresden Station Manager 2605 N. 21st Road Marseilles, Illinois 61341-9756

U.S. Nuclear Regulatory Commission Dresden Resident Inspectors Office 6500 N. Dresden Road Morris, Illinois 60450-9766

William D. Leach Manager - Nuclear MidAmerican Energy Company 907 Walnut Street P.O. Box 657 Des Moines, Iowa 50303 Vice President - Law and MidAmerican Energy Company Regulatory Affairs One River Center Place 106 E. Second Street P.O. Box 4350 Davenport, Iowa 52808

Chairman Rock Island County Board of Supervisors 1504 3rd Avenue Rock Island County Office Bldg. Rock Island, Illinois 61201

Chairman Grundy County Board Administration Building 1320 Union Street Morris, Illinois 60450

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U.S. Nuclear Regulatory Commission Quad Cities Resident Inspectors Office 22712 206th Avenue N. Cordova, Illinois 61242

Phillip P. Steptoe, Esquire Sidley and Austin One First National Plaza Chicago, Illinois 60603

Assistant Attorney General 100 W. Randolph Street, Suite 12 Chicago, Illinois 60601 U.S. Nuclear Regulatory Commission LaSalle Resident Inspectors Office 2605 N. 21st Road Marseilles, Illinois 61341-9756

Chairman LaSalle County Board of Supervisors LaSalle County Courthouse Ottawa, Illinois 61350

Chairman Illinois Commerce Commission Leland Building 527 E. Capitol Avenue Springfield, Illinois 62706

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Commonwealth Edison Company Zion Station Manager 101 Shiloh Blvd. Zion, Illinois 60099-2797

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Mr. Dennis L. Farrar Regulatory Services Manager Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

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Commonwealth Edison Company Reg. Assurance Supervisor - Braidwood RR 1, Box 84 Braceville, Illinois 60407

Commonwealth Edison Company Reg. Assurance Supervisor - Dresden 2605 N. 21st Road Marseilles, Illinois 61341-9765

Commonwealth Edison Company Reg. Assurance Supervisor - Quad Cities 22710 206th Avenue N. Cordova, Illinois 61242-9740

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