



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

May 19, 1980

Mr. W. P. Haass, Chief
Quality Assurance Branch - DPM
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Haass:

Subject: Commonwealth Edison Company
Quality Assurance Program
Topical Report CE-1-A Revisions
NRC Dkts. 50-10, 50-237, 50-249,
50-254, 50-265, 50-295, 50-304,
50-373, 50-374, 50-454, 50-455,
50-456 and 50-457

Page 1-7 of Commonwealth Edison Company (CECo) Topical Report, CE-1-A, "Commonwealth Edison Company Quality Assurance Program for Nuclear Generating Stations" relative to NRC-Q421.7 is revised to replace the original page submittal of Rev. 11, dated 12/21/79, to include the education and experience requirements provided as the staff position in Mr. Walter P. Haass's letter of May 8, 1980, with the exception of the last sentence of that position whereby "six months of the one year experience shall be obtained within the quality assurance organization."

Such a commitment is impractical and unduly and unnecessarily restrictive and would automatically preclude the utilization of many qualified upper and Corporate level managers within Commonwealth Edison who have had many years of nuclear experience including responsibilities for the implementation of the Corporate Quality Assurance Program requirements within their own areas of responsibility such as for design, operation, construction and other nuclear support and services activities including pre-operational and startup testing activities. Such a six month commitment will essentially limit the filling of the Manager of Quality Assurance position in Commonwealth Edison to either promoting from within Quality Assurance or hiring someone from outside the Company. Further, with the currently high worker mobility being experienced in the nuclear industry, the need to replace the Manager of Quality Assurance could happen suddenly without warning. Under such a required experience commitment it is

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conceivable that the desired replacement would have to work in Quality Assurance for six months to get the required six months experience in Quality Assurance before the position could be filled. To be placed in such a position would not be in the best interest of the objectives concerning Quality Assurance in the nuclear industry.

Based on the above explanation, it is requested that this submittal be deemed as an acceptable response to 2/21.7.

Rev. 12 to page 1-7 is enclosed for replacement of Rev. 11 page 1-7. Rev. 12 merely reflects a change in corporate organization and title within the paragraph delineated.

Very truly yours,

D. L. Peoples
Director of
Nuclear Licensing

Attachments