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

February 29, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
LaSalle County Station Unit 1 and 2
Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Response to Generic Letter No. 83-28
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454/455 and 50-456/457

Reference (a): Generic Letter No. 83-28 D. G. Eisenhut letter to All OLs and CPs dated July 8, 1983 (NL-83-0003)

(b): P. L. Barnes to H. R. Denton letter dated November 5, 1983 (NL-83-0520)

Dear Mr. Keppler:

Reference (a) requested that the Commonwealth Edison Company provide a written report of the status of current conformance with the positions contained in the subject letter. Reference (b) provided that status.

The attachments to this letter supplements the positions as reported in Reference (b).

To the best of my knowledge and belief, the statements contained in the Attachment are true and correct. In some respects, these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees, consultants and contractors. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

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Please address any questions that you or your staff may have concerning our response to Generic Letter No. 83-28 to this office.

Respectfully,

P. L. Barnes

P. L. Barnes
Nuclear Licensing Administrator

Attachment

cc: U.S. NRC, Document Control Desk
Washington, DC 20555

J. G. Keppler - RIII
RIII Inspectors:
D - Part I only
QC - Part II only
Z - Part III only
LSC - Part IV only
BY - Part V only
BW - Part VI only

SUBSCRIBED and SWORN to
before me this 29th day
of February, 1984

Rosalie A. Puente
Notary Public

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

Supplemental Response To Generic Letter No. 83-28
"Required Actions Based on Generic Implications
of Salem ATWS Events"

Part I	Dresden Station Units 2 and 3
Part II	Quad Cities Station Units 1 and 2
Part III	Zion Station Units 1 and 2
Part IV	LaSalle County Station Units 1 and 2
Part V	Byron Station Units 1 and 2
Part VI	Braidwood Station Units 1 and 2

02-29-84

8215N

Part I - Dresden Station Units 2 and 3

Supplemental Response to Generic Letter 83-28

02-28-84

Item 2.2 Equipment Classification and Vendor Interface (Programs For All Safety-Related Components

1. Equipment Classification

In Reference (b) we indicated that evaluation was ongoing of procedural controls for safety related listings, uniformity of approach between stations, applicable environmental requirements and period of listing update. The following supplements Reference (b).

Procedures are in place to control the classification of structures, systems, components, and parts within components.

As detailed in our November 5, 1983 submittal, the responsibility for classification of safety related systems and components rests with the Projects Department (PED) for those plants under construction and with the Station Nuclear Engineering Department (SNED) for operating plants. In operating plants, the Tech Staff Supervisor is responsible for determining the classification of parts or materials within a component with SNED assisting the Station in this work as requested.

The procedure that controls the classification work performed by SNED and PED is a SNED quality procedure based on the requirements of the Corporate Quality Assurance Manual. Likewise, the procedures that control the classification of parts by operating stations personnel are Station administrative procedures based on criteria and guidance provided by SNED.

The SNED procedure specifies that components are to be identified on Drawings or Lists, which are to be maintained current by updates resulting from modifications to the plant.

Our review for uniformity and consistency between nuclear stations shows that the format of documentation used for classification of safety related components varies from station to station. Our conclusion is that this is not a problem, as our classification methodology is sound.

Regarding Environmental Qualification, submittals have been made for all six nuclear stations covering the environmental qualification of electrical equipment located in harsh environments, in accordance with the requirements of Rule 50.49. In addition Byron and Braidwood qualification submittals, beyond the scope of Rule 50.49, have been made to cover environmental qualification of active mechanical equipment in harsh zones as well as seismic qualification of electrical and active mechanical equipment in both harsh and mild zones.

The submittals for Dresden, Quad Cities and Zion were made in response to I&E Bulletin 79-01B and the equipment is being qualified in accordance with the requirements of the DOR Guidelines. The submittals for LaSalle, Byron and Braidwood were made as part of their request for an OL and the equipment is being qualified in accordance with the requirements of NUREG 0588.

2. Vendor Interface

Commonwealth Edison is participating in the INPO sponsored Nuclear Utility Task Action Committee (NUTAC) evaluating this position. The objective of the NUTAC is to issue guidelines for a vendor interface program. These guidelines are now scheduled to be completed in mid-March, 1984. We will review and evaluate these guidelines for incorporation and provide the requested report on the vendor interface program by June 1, 1984.

Item 4.5 Reactor Trip System Reliability (System Functional Testing)

Commonwealth Edison is participating with the BWR Owner's Group in review of Reactor Trip System functional testing. The final report based on this review is scheduled for completion in March, 1984. We will review the groups' recommendation when issued.

Part II - Quad Cities Station Units 1 and 2

Supplemental Response to Generic Letter 83-28

02-29-84

Item 2.2 Equipment Classification and Vendor Interface (Programs For All Safety-Related Components

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Item 4.5 Reactor Trip System Reliability (System Functional Testing)

Commonwealth Edison is participating with the BWR Owner's Group in review of Reactor Trip System functional testing. The final report based on this review is scheduled for completion in March, 1984. We will review the groups' recommendation when issued.

Part III - Zion Station Units 1 and 2

Supplemental Response to Generic Letter 83-28

02-29-84

Item 2.2 Equipment Classification and Vendor Interface (Programs For All Safety-Related Components

1. Equipment Classification

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Commonwealth Edison is participating in the INPO sponsored Nuclear Utility Task Action Committee (NUTAC) evaluating this position. The objective of the NUTAC is to issue guidelines for a vendor interface program. These guidelines are now scheduled to be completed in mid-March, 1984. We will review and evaluate these guidelines for incorporation and provide the requested report on the vendor interface program by June 1, 1984.

Item 3.2 Post Maintenance Testing (All Other Safety Related Components)

The Station continues to review the Westinghouse Technical Bulletins and Data Letters and expects to complete the project by June 30, 1984 with any required procedure changes being in place at approximately the same time.

Item 4.2 Reactor Trip System Reliability (Preventative Maintenance And Surveillance Program For Reactor Trip Breakers)

Westinghouse has recommended preventative maintenance every 6 months and at least every 200 cyles. Zion will continue to overhaul the breakers on a refueling outage basis since we accumulate approximately 50 breaker actuations per fuel cycle.

Item 4.3 Reactor Trip System Reliability (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)

The Westinghouse Owners Group recommended modification has been initiated for both units and should be installed during the 1985 refueling outage.

Item 4.5 Reactor Trip System Reliability (System Function Testing)

The modification referred to in Item 4.3 will incorporate the necessary test features.

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Part IV

LaSalle County Station Units 1 and 2

Supplemental Response to Generic Letter 83-28

02-29-84

Item 2.2 Equipment Classification and Vendor Interface (Programs For All Safety-Related Components

1. Equipment Classification

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The submittals for Dresden, Quad Cities and Zion were made in response to I&E Bulletin 79-01B and the equipment is being qualified in accordance with the requirements of the DOR Guidelines. The submittals for LaSalle, Byron and Braidwood were made as part of their request for an OL and the equipment is being qualified in accordance with the requirements of NUREG 0588.

2. Vendor Interface

Commonwealth Edison is participating in the INPO sponsored Nuclear Utility Task Action Committee (NUTAC) evaluating this position. The objective of the NUTAC is to issue guidelines for a vendor interface program. These guidelines are now scheduled to be completed in mid-March, 1984. We will review and evaluate these guidelines for incorporation and provide the requested report on the vendor interface program by June 1, 1984.

Item 4.5 Reactor Trip System Reliability (System Functional Testing)

Commonwealth Edison is participating with the BWR Owner's Group in review of Reactor Trip System functional testing. The final report based on this review is scheduled for completion in March, 1984. We will review the groups' recommendation when issued.

Part V

Byron Station Units 1 and 2

Supplemental Response to Generic Letter 83-28

02-29-84

Item 2.2 Equipment Classification and Vendor Interface (Programs For All Safety-Related Components

1. Equipment Classification

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2. Vendor Interface

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Item 1.1 Post-Trip Review

In Reference (b) the Station committed to update procedures to implement Nuclear Station Division Directive NSDD-008 "Plant Startup After Trip". This procedure has been updated and approved for use.

Item 3.1 Post Maintenance Testing (Reactor Trip System Components)

The Proof and Review copy of Byron Station's Technical Specifications as issued by the NRC does not contain requirements that would degrade rather then enhance plant safety.

Item 3.2 Post Maintenance Testing (All Other Safety Related Components)

The Proof and Review copy of Byron Station's Technical Specifications as issued by the NRC does not contain requirements that would degrade rather than enhance plant safety.

Item 4.2 Reactor Trip System Reliability (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)

Life cycle testing of the shunt trip attachment and the undervoltage trip attachment of the reactor trip switchgear is being conducted by Westinghouse for the Westinghouse Owners Group. This program is aimed toward establishing the service life of these devices, and substantiating periodic test requirements with proper maintenance, replacement and qualification programs. The test program is scheduled for completion in the second quarter of 1984.

Byron Station will review the results and recommendations of this program for incorporation into Station procedures.

Item 4.3 Reactor Trip System Reliability (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)

The Westinghouse Owner's Group recommended modification will be implemented on both units. Scheduling is not yet complete. We will advise you of finalized schedules.

Part VI

Braidwood Station Units 1 and 2

Supplemental Response to Generic Letter 83-28

02-29-84

Item 2.2 Equipment Classification and Vendor Interface (Programs For All Safety-Related Components

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Braidwood Station will review the results and recommendations of this program for incorporation into Station procedures.

Item 4.3 Reactor Trip System Reliability (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&E Plants)

Braidwood has not completed a review of the Westinghouse Owners Group recommended modification. This review will be completed and decision made on implementation by June 1, 1984.

Item 4.5 Reactor Trip System Reliability (System Function Testing)

See Item 4.3.

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