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April 27, 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
In-Progress Audit of Detailed
Control Room Design Review
NRC Docket Nos. 50-237 and 50-249

Reference (a): D. M. Crutchfield letter to B. Rybak
dated March 14, 1984.

Dear Mr. Denton:

As stated in the referenced letter, Commonwealth Edison Company (CECo) is pursuing a course of review which the Staff believes will satisfy the requirements of NUREG-0737 Supplement 1. The referenced letter also transmitted to us the results of the NRC in-progress audit of the Dresden Station Units 2 and 3 Detailed Control Room Design Review (DCRDR). These results included useful suggestions for enhancing the DCRDR program, some which have already been adopted. The attachment to this letter contains specific details and clarifications which are being submitted for your information.

If you have any questions regarding this matter, please contact this office.

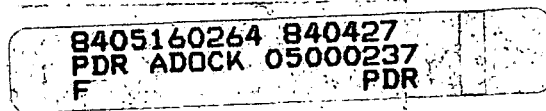
One signed original and forty (40) copies of this transmittal are provided for your use.

Very truly yours,

B. Rybak
Nuclear Licensing Administrator

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Attachment



cc: R. Gilbert - NRR
NRC Resident Inspector - Dresden

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CECO Comments to the In-Progress Audit of
Dresden Station Units 2 and 3
DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

The findings of the in-progress audit of the Dresden Station DCRDR led the NRC audit team to conclude that the DCRDR program should prove to be successful. The conclusions stated the program could be enhanced by relatively minor upgrades to the program and summarized three suggestions. The following states the summarized suggestions and provides a Commonwealth Edison Company (CECo) comment for each suggestion.

1. Suggestion

Increased attention to technical detail by providing additional operational expertise permanently assigned to the DCRDR.

Comment

CECo has increased the involvement of subject matter experts which serve to augment the review team in areas where plant-specific technical expertise is required. The CECO DCRDR program plan states a subject matter expert must have a senior reactor operator's license.

2. Suggestion

Provide better integration of the DCRDR with other NUREG-0737 initiatives while the DCRDR is in progress.

Comment

The in-progress audit report indicated a concern regarding the level of management involvement in the DCRDR, especially in regards to the coordination and integration of the DCRDR with other improvement programs.

As described in Section 1 of CECO's April 14, 1983 submittal, our integration concept is based on human factor activities (task analysis, control room inventory, etc) interfacing and tying all improvements together. This integration concept is coordinated by the Station Nuclear Engineering Department.

It is not always possible to implement such diverse initiations in parallel. Therefore there is by necessity, and iterative process that must take place to ensure that the programs support and benefit from each other. This is how the other NUREG-0737 Supplement 1 initiatives are going to be integrated with the DCRDR.

Presently efforts are underway to more clearly define the schedule and the elements involved in the integration effort.

We assure you that we fully intend to implement the integration approach described in our submittal.

3. Suggestion

Re-evaluate the CECo human engineering guideline to obviate the apparent a priori elimination of potential HED items from the formal assessment process by means of modifications to human engineering guidelines.

Comment

CECo will use the CECo Human Factors Checklist. However, some checklist items were changed back to the values provided in the NUREG-0700 Section 6 guidelines after review of the audit teams' unofficial comments on CECo Checklist.