



Commonwealth Edison
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June 1, 1988

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

**Subject: Dresden Station Units 2 and 3
Response to the SALP 7 Board Report
NRC Docket Nos. 50-237 and 50-249**

References (a): A.B. Davis letter to Cordell Reed
dated April 20, 1988

(b): Cordell Reed letter to Victor Stello, Jr.,
"Commonwealth Edison's Response to NRC
Diagnostic Evaluation" dated January 22, 1988

Dear Mr. Davis:

Reference (a) transmitted the SALP 7 Board Report for Dresden Station and summarized our performance ratings for the period January 1, 1987 through January 31, 1988. The purpose of this letter is to provide Commonwealth Edison's comments, as also requested in Reference (a).

We believe that the SALP 7 Board Report is well written and generally represents a balanced look at our strengths, improvements, and problems encountered during the report period. We recognize this as the NRC's subjective "report card" which provides your perspective. As we discussed during the SALP meeting on May 2, 1988, we were especially disappointed with your decision to override the Board's recommendation for a rating of Category 2 in the Maintenance area, and, likewise, we were disappointed with the Board's decision to change Licensing from a Category 1 for SALP 6 to a Category 2 for SALP 7.

With respect to the Maintenance area, we appreciate your frankness during the meeting. We understand that, for the reasons addressed in the Reference (a) cover letter, your perception of our performance in this area during the rated period resulted in your decision of a Category 3 rating with an improving trend. We accept that you did not do this lightly, and we take to heart your statements that based on our improving trend, Region III personnel would anticipate a rating of at least a 2 for the current SALP period.

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With respect to the Licensing area, we acknowledge that, due to the terminal illness of the Dresden Nuclear Licensing Administrator, workload was increased on other members of the Licensing Department. Overall staffing of the Nuclear Licensing Department was increased during this period and a replacement Dresden Nuclear Licensing Administrator was in place during the last several months of the assessment period.

Reference (b) introduced you to the Dresden Station Improvement Plan (DSIP) which is a comprehensive initiative to assure that recent improvements in performance are sustained and that excellence in nuclear operations is achieved. DSIP integrated all of our initiatives at self-improvement into a single program under the position of Superintendent of Performance Improvement, which was created in October, 1987. The DSIP program is aggressive and addresses not only NRC areas of concern, but constitutes the overall goals program for Dresden Station as we strive for excellence.

Commonwealth Edison believes that Dresden Station is on a strong, steady, and sustained improving trend. On April 19, 1988, we provided you, your senior staff, and NRR representatives an update of the results of our performance improvement activities. These results reflect the continuation of improvements, many of which were initiated before the collection and integration of effort under DSIP.

During the Summary Remarks at the SALP meeting, Mr. Ring indicated that, although the numerical ratings of SALP 7 were not substantially different from those in SALP 6, in balance, the station was much improved. Specifically, the following were noted:

- The Maintenance Category 3 and improving should not be viewed as a decline from last year.
- With the additional staffing, the Licensing area was much improved at the end of the period, but too late to affect the rating.
- Operations showed significant improvement, with a Category 2 and improving vs. a Category 2 and declining trend at the end of SALP 6.
- Emergency Preparedness was rated a Category 2 and improving, vs. a Category 2 at the end of SALP 6.
- Quality Programs and Administrative Controls Affecting Quality improved from a Category 3 to a Category 2 in SALP 7.

During your closing remarks at the meeting, you stated that "this should really be viewed as a good, not excellent, but good report."

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We believe that the improvements noted in your report and in the NRC presentation at the SALP meeting, and the performance improvement results which we presented on April 19, 1988, are the direct result of our commitment to achieve sustained performance excellence at Dresden Station. This commitment continues and is now focused through our DSIP.

Please direct any comments you may have regarding this response to this office.

Very truly yours,



Cordell Reed
Senior Vice President

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cc: B. L. Siegel - Project Manager, NRR
S. G. DuPont - Dresden Resident Inspector