



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

October 4, 1989

Dr. Thomas E. Murley, 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
Request for Additional Information
on Generic Letter 83-28
NRC Docket Nos. 50-237/249 and 50-254/265

- References (a): Generic Letter 83-28, D.G. Eisenhut letter
to All OLs and CPs dated July 8, 1983.
- (b): P.L. Barnes letter to H.R. Denton dated
November 5, 1983.
- (c): P.L. Barnes letter to H.R. Denton dated
February 24, 1984.
- (d): R. Stols letter to T.E. Murley dated April 3,
1989.

Dr. Murley:

Reference (a) requested that Commonwealth Edison provide a written report of the status of conformance with the positions contained in the subject letter. References (b), (c), and (d) provided the information.

A teleconference was held between members of the NRC and Commonwealth Edison staffs to provide additional clarification to the above referenced letters. During the course of the meeting, the NRC Staff members requested additional clarification to Item 2.2, Equipment Classification and Vendor Information. The attachment to this letter should address the issues discussed during the meeting.

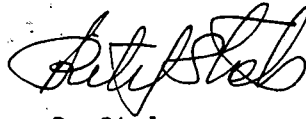
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Please direct any questions you may have regarding this matter to this office.

Very truly yours,



R. Stols
Nuclear Licensing Administrator

Im

Attachment

cc: A.B. Davis - Regional Administrator, Region III
T.M. Ross - Project Manager, NRR
B.L. Siegel - Project Manager, NRR
Senior Resident Inspector - Quad Cities
Senior Resident Inspector - Quad Cities

ATTACHMENT

REQUEST FOR CLARIFICATION

2.2 Equipment Classification and Vendor Interface (Programs for All Safety-related Components)

2.2.1.1 - Safety related Parts Classification

Dresden and Quad Cities Stations were licensed prior to any "safety-related" classification requirements; however, Chapter 12 of the FSAR identified systems whose failure could cause a significant release of radioactivity or which are vital for safe shutdown of the plant and removal of decay heat. These systems are described as Class I. These systems have historically been treated as safety-related unless further review justified reclassification.

NSED Procedure Q.12, Classification and Listing of Safety-related Items and ASME Section III Components, establishes the method for classification and listings of safety related items. Exhibits B and C of procedure Q.12 delineates the criteria used to classify components and parts of safety related systems. These exhibits require all components and parts which ensure the safety function of a system to be classified as safety related.

Following classification, the equipment is included in the Safety-Related Classification List (SRCL). The introduction to the list defines safety related equipment as the equipment required to maintain primary containment pressure boundary, perform a function necessary for safe shutdown, or to conform with 10 CFR 100 guidelines. This statement conforms with the definition for safety related equipment contained in the footnote of Item 2.2 of Generic Letter 83-28.

2.2.1.2 - Information Handling System

The responsibility for preparation, validation, maintenance and periodic distributions of the Safety Related Classification List (SRCL) has been designated to the Nuclear Engineering Department, BWR System Design Group per Nuclear Engineering Department Procedure Q.12 and Q.12.1. The BWR Systems Design Group is required to update and issue the SRCL via a controlled distribution list. The controlled distribution is performed on a quarterly basis and assures that accurate and updated information is distributed.

One individual is responsible for updating the list. Access to update the list is restricted via a computer password. Other computer passwords can access the information for viewing and printing, only.

2.2.1.3 - Use of Information Handling Systems

All work performed at the Commonwealth Edison Nuclear Stations is governed by the Work Request System. CECO's Corporate Quality Assurance Program, as well as Station Administrative Procedures, provide guidance on initiating and completing work requests. The work request requires that the work be classified, e.g., safety-related, reliability related. The classification of work is based on the Safety Related Classification List. The in-line functions are required to classify the work and the Quality Control (for all work requests) and Quality Assurance (for other than non-safety related work requests) Departments are required to approve the work request and its classification prior to the start of the work. These controls assure that safety related activities are performed under the controls required for safety related classification.

Following completion of the work, Quality Assurance and Quality Control perform another review of the work package to ensure that the work performed, which is required to be described in the work package, was performed in accordance with the requirements of the classification.

2.2.1.4 - Management Controls

Typically, Station Quality Assurance Groups review modification and work requests available at the morning planning meeting which include senior plant management attendance. This review is conducted prior to the development of the work package. One element of this review involves concurrence with the classification of safety-related, non-safety related, regulatory related and reliability related work requests and modifications. Concerns noted during this review are resolved prior to the start of the work.

Additionally, Quality Assurance performs periodic audits and surveillances which review classifications for selected work requests and modifications. The source document for this verification is the Master Equipment List/Safety Related Classification List (MEL/SRCL). The reports of the audits and surveillances are distributed to senior plant management as well as selected Corporate managers.

Quality Assurance also performs audits and surveillances of the CECO Engineering Department. These audits and surveillances include verification that components are properly classified on the SRCL. Similar to the Station audits and surveillance, the Engineering audits and surveillance reports are distributed to senior Engineering management. The surveillances and audits, although programmatic in nature, reviews the classification of equipment contained in the MEL/SRCL.