



**Commonwealth Edison**  
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October 27, 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 29, 1984.
- (d): R. Stols letter to T.E. Murley dated April 3,  
1989.
- (e): R. Stols letter to T.E. Murley dated October 4,  
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 Section 2.2, Equipment Classification and Vendor Information. Reference (e) was submitted to address the issues discussed

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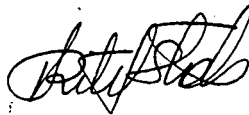
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during the meeting. Subsequent review of Reference (e) indicated that further clarification was required for Items 2.2.1.1 and 2.2.1.2. The attached response supersedes the response in Reference (e) for Items 2.2.1.1 and 2.2.1.2.

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

Very truly yours,



R. Stols  
Nuclear Licensing Administrator

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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 - Dresden

## ATTACHMENT

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

#### 2.2.1.1: Safety-Related Component 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 and have historically been treated as safety-related unless further review justified reclassification.

Commonwealth Edison's initial response to Generic Letter 83-28 (dated November 5, 1983) indicated that Nuclear Stations Engineering Department's (NSED's) quality procedure Q.12 (Exhibits "B" and "C") contained the criteria for classifying components and parts as safety-related. Since that initial response, NSED's quality procedure Q.12 has been deleted and a site specific procedure, Q.12.1, for Dresden and Quad Cities Stations was issued. NSED procedure Q.12.1 establishes the method for the classification and listing of safety-related structures, systems, components, and ASME Section III components. Exhibit "B" of procedure Q.12.1 delineates the criteria used to classify components of safety-related systems. This exhibit requires all components which ensure the safety function of a system to be classified as safety-related. The approach utilized in Procedure Q.12.1 (Exhibit B) to classify components is consistent with the approach described in Procedure Q.12 (Exhibit B). Classification of parts (previously performed utilizing Exhibit C of Procedure Q.12) are conducted by the stations and are reviewed by the Nuclear Engineering Department as specified in NSED procedure Q.48 (Review and Verification of Parts Classification Performed at a Nuclear Power Station).

Following classification, the components are 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 Systems Design Group, in accordance with NSED procedure 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.