



Commonwealth Edison
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December 28, 1989

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
LaSalle County Station Units 1 and 2
Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Response to Generic Letter 89-10
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454/455, and 50-456/457

References: NRC Generic Letter 89-10, Safety-Related
Motor-Operated Valve Testing and Surveillance,
dated June 28, 1989.

NRC/CECo Interface Meeting between J. Zwolinski
(NRC) and C. Reed (CECo) at Downers Grove,
Illinois, on December 20, 1989.

Dear Sir:

The referenced Generic Letter extended the recommendations outlined in Bulletin 85-03 and its supplement to all safety-related and position-changeable motor-operated valves (MOV's). Additionally, the Generic Letter required a response within six months regarding compliance with the NRC proposed schedule and recommendations for MOV testing and surveillance. This letter is intended to address that requirement.

Commonwealth Edison Company (CECo) understands and shares the NRC's concerns about the assurance of operability of safety-related MOV's. CECo implemented a comprehensive MOV program in response to Bulletin 85-03 which included the following:

- a corporate directive which established a uniform policy for all six CECo nuclear stations,
- an MOV coordinator at each station backed-up by corporate support,
- evaluation (design basis review) of all MOV's which were identified to be in the program,
- evaluation of diagnostic testing techniques and the selection of the most appropriate technique for the program, and
- performance of MOV diagnostic testing.

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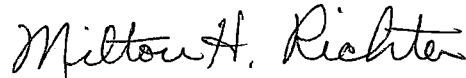
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In view of the MOV program presently in place and the expanded scope requested by the Generic Letter, CECo would like to propose an alternative to the schedule and testing requirements delineated in the Generic Letter. The proposed alternative will prioritize the testing program for the MOVs based on safety significance and recent maintenance activity.

At the referenced meeting, it was suggested that CECo may wish to discuss its proposed actions for certain generic issues prior to submittal of the response to ensure that the proposed actions satisfy the NRC concerns. Consistent with this suggestion, CECo proposes to discuss the alternative MOV program prior to formally submitting the required response. CECo will finalize the meeting date and time with you during the first week in January 1990, with the objective of meeting during that month.

Please address any questions concerning this response to this office.

Respectfully,



M.H. Richter
Generic Issues Administrator

MHR/gad/0472T

cc: A.B. Davis - Regional Administrator, Region III
Resident Inspectors - D/QC/Z/LSCS/BY/BW
T. Ross - NRR

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 28 DAY
OF December, 1989.



PATRICIA LYNN MARLOW
NOTARY PUBLIC

