



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690 - 0767

January 3, 1990

Dr. Thomas E. Murley  
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  
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  
Fitness-for-Duty Certification  
NRC Docket Nos. 50-237/249, 50-254/265,  
50-295/304, 50-373/374, 50-454/455 & 50-456/457

- References: (a) Nuclear Regulatory Commission 10 CFR Part 26,  
Fitness-for-Duty Programs; Final Rule  
and Statement of Policy, dated June 7, 1989  
(b) NUREG-1385, Fitness-for-Duty in the  
Nuclear Power Industry: Responses to  
Implementation Questions, October 1989

Dear Dr. Murley:

This letter provides the basis for Commonwealth Edison Company's (CECo) belief that by January 3, 1990, a fitness-for-duty (FFD) program that meets the requirements in 10 CFR Part 26, the Nuclear Regulatory Commission's (NRC) FFD rule, will be implemented. Inherent in this belief is the recognition that the FFD rule, like any new rule, contains provisions that have required interpretation in the course of implementing an FFD program. Indeed, the NRC already has provided some informal interpretations of the rule in NUREG-1385. CECo understands that some of the interpretations may subsequently be reviewed by the NRC. In that event, CECo's FFD program will be revised to conform with any final, binding interpretation of 10 CFR Part 26.

CECo has had some experience with the kinds of determinations required by the FFD rule, including non-random drug testing, but has not conducted as broad a program as required by 10 CFR Part 26. To implement the program required by the FFD rule, various CECo departments have been assigned responsibilities for various aspects of 10 CFR Part 26. Those departments have reported that they have implemented their assigned responsibilities as CECo understands them.

Among the program elements implemented are:

- \*establishment of performance objectives
- \*establishment and implementation of written policies and procedures
- \*conduct of training and retraining

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- \*establishment of appropriate relations with contractors and vendors
- \*establishment of an employee assistance program
- \*initiation of management actions and provision for sanctions for failure to comply with the FFD policy
- \*implementation of an appeals process
- \*establishment of a system of files and procedures for protecting them
- \*establishment of recordkeeping requirements
- \*establishment of reporting requirement procedures
- \*provisions for audits
- \*Implementation of a chemical testing program as described in Appendix A to 10 CFR Part 26 except for the modified cut-off levels listed below:

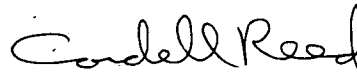
MODIFIED CUT-OFFS

<u>Chemical</u>	<u>Initial Test Cut-Off Level</u>	<u>Confirmatory Test Cut-Off-Level</u>
Cannabinoids	20 ng/ml	Same as Rule
Benzodiazepines	300 ng/ml	50 ng/ml

Any other requirements in 10 CFR Part 26 which have not been listed but which are included in the rule have also been implemented in accordance with CECO's understanding of the rule. This implementation has been reviewed in accordance with corporate practices which rely in part on the reliability of reports by subordinates who are actually responsible for implementing the assigned responsibilities. Based on that review, CECO concludes that by January 3, 1990, the requirements in 10 CFR Part 26 as CECO currently understands them will be fully satisfied.

If there are any questions on this letter, please contact T.J. Kovach of my staff.

Very truly yours,



Cordell Reed  
Senior Vice President  
Nuclear Operations

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cc: A. Bert Davis-Regional Administrator - RIII  
Resident Inspectors - D/QC/Z/LSC/BY/BW  
J. Craig-Project Director-NRR



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
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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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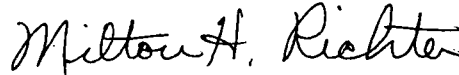
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In view of the MOV program presently in place and the expanded scope requested by the Generic Letter, CECO would like to propose an alternative to the schedule and testing requirements delineated in the Generic Letter. The proposed alternative will 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,

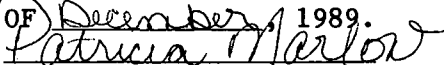


M.H. Richter  
Generic Issues Administrator

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.

  
NOTARY PUBLIC

