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DCW

August 13, 1990

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 9 Board Report
NRC Docket Nos. 50-237 and 50-249

Reference: A.B. Davis (NRC) letter to C. Reed (CECo),
dated June 29, 1990, transmitting the SALP 9
Board Report No. 50-237/90001 and 50-249/90001

Mr. Davis:

The referenced letter transmitted the SALP 9 Board Report for Dresden Station which summarized the station's performance rating for the period of February 1, 1989 through April 30, 1990. Commonwealth Edison appreciated the opportunity to discuss this report with members of the NRC staff during the meeting held at Dresden Station on July 23, 1990. The purpose of this letter is to provide Commonwealth Edison's comments.

We are pleased to receive Category 1 ratings in the areas of Plant Operations, Emergency Preparedness, and Security. In the areas of Maintenance/Surveillance, Radiological Controls, Engineering/Technical Support, and Safety Assessment/Quality Verification, we note your recognition of continued general improvement. We believe that this SALP report reflects the overall continuation of the improving trend at Dresden Station over the last four years. We will continue to focus our efforts on programs and initiatives that will sustain this positive trend.

Based on our review of the SALP report, we would like to discuss three topics in this letter. Those topics being: the addition of personnel to Dresden Station's Technical Staff, the implementation of the Maintenance Improvement Program for balance-of-plant equipment, and the apparent rating impact one issue had in the area of Safety Assessment/Quality Verification.

As indicated in the Engineering/Technical Support area of the SALP report, Commonwealth Edison has been increasing the number of personnel in Dresden Station's Technical Staff to address manpower concerns. This effort will increase the number of personnel in the Technical Staff by approximately thirty-five percent (35%). To ensure the maximum benefit is gained from these staffing additions, an extensive training program is being developed.

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The Maintenance/Surveillance area of the SALP report indicated that the Maintenance Improvement Program for balance-of-plant equipment was not yet complete, and consequently, an improved reliability for balance-of-plant equipment has not been realized. The Maintenance Improvement Program is being applied simultaneously to both safety-related and balance-of-plant systems. Approximately fifty percent (50%) of the systems scheduled for preventative maintenance improvements are balance-of-plant. It is expected that this effort will result in improved reliability of the balance-of-plant equipment.

In the area of Safety Assessment/Quality Verification, the dialogue shared at the SALP meeting (on July 23, 1990) was very productive and reflects an open discussion on issues important to our continuing improvement. Your staff acknowledges the strong and continuing improvement in our performance based Quality Assurance audits, as well as station management activities which monitor performance and ensure quality. We also agree in large measure with your staff's assessment of the need for, and the progress we are making in, the improvement in quality and timeliness of our license submittals on technical issues. In this regard, while we understand the concern expressed with respect to our original station blackout submittal, the impact of an individual submittal upon the overall Safety Assessment/Quality Verification rating was greater than we expected. This is especially true where the submittal was significantly expanded within the SALP period to provide for more than minimal compliance with the rule. While we believe our SALP rating of 2 and improving shows strong safety performance, we believe that a SALP 1 rating is justified. Recognizing that such ratings have a subjective element, we will accept your decision. However, we would ask that our overall strong safety assessment/quality verification performance be acknowledged clearly and given its proper weight.

Commonwealth Edison appreciates the efforts of the NRC in preparing the SALP report.

Please direct any comments regarding this response to the Nuclear Licensing Department.

Respectfully,



L.O. DelGeorge
Assistant Vice-President

cc: B. Siegel - Project Manager, NRR
S. DuPont - Senior Resident Inspector, Dresden Station
NRC Document Control Desk