



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 26, 1990

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

Subject: Dresden Station Units 2 and 3
Quad Cities 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
Alternative Schedule for Generic Letter 90-03
NRC Docket Nos. 50-237/249, 50-254/265
50-295/304, 50-373/374, 50-454/455 and 50-456/457

References: (a) Generic Letter 90-03, dated March 20, 1990.
(b) Generic Letter 90-03, Supplement 1, dated
May 14, 1990.

Dear Sir:

Generic Letter 90-03 and Supplement 1, addressed to all power reactor licensees and applicants, requested that addressees review and update their vendor interface programs (VETIP) to reflect guidance provided in the Generic Letter.

This letter provides Commonwealth Edison Company's (CECo) response to the Generic Letter for Dresden, Quad Cities, Zion, LaSalle County, Byron and Braidwood Stations. The attached response provides a summary of the actions taken to date and delineates those activities planned to fulfill the requirements of the Generic Letter.

Please direct any questions concerning this response to this office.

Respectfully,

D. L. Taylor
Generic Issues Administrator

9010050004 900926
PDR ADCK 05000237
P PDC

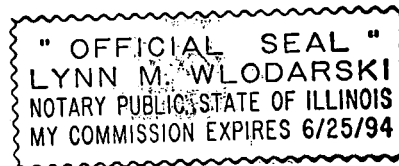
A016
114

Attachment: CECo Response to Generic Letter 90-03

cc: A.B Davis, Regional Administrator - Region III
Resident Inspectors - D/QC/Z/LSCS/BY/BW
B. Siegel, Project Manager - NRR
L. Olshan, Project Manager - NRR
C. Patel, Project Manager - NRR
R. Pulsifer, Project Manager - NRR
T. Boyce, Project Manager - NRR
S. Sands, Project Manager - NRR

DT/1mw
ZNLD300

Signed before me on this 26 day
of September, 19 90
by Lynn M Wlodarski
Notary Public



ATTACHMENT

CECO RESPONSE TO GENERIC LETTER 90-03

Generic Letter 90-03, addressed to all power reactor licensees and applicants, requested that addressees review and update their vendor interface programs (VETIP) to reflect guidance provided in the Generic Letter.

GENERIC LETTER ACTION ITEMS

The staff concludes that an adequate vendor interface program should include:

- (a) A program with the NSSS vendor as described in the VETIP, which covers all the safety-related components within the NSSS scope of supply. This program should include provisions for assuring receipt by the licensee/applicant of all technical information provided by the NSSS vendor; and
- (b) A program of periodic contact with the vendors of other key safety-related components not included in (a) above.

The vendor interface program should also take into account the requirements of 10 CFR Part 50, Appendix B which requires the licensee or applicant to be responsible for establishing and executing the quality assurance program. It states that the licensee or applicant may delegate to others the work of establishing and executing the quality assurance program or any part of it, but the licensee or applicant shall retain responsibility for the program. Therefore, the licensee or applicant should have a program which assures that procedures and instructions are properly prepared and implemented and that quality assurance programs for design, maintenance or modification work performed on safety-related equipment by outside vendors or contractors are properly implemented. These programs should clearly establish and delineate in writing the authority and duties of persons and organizations performing activities affecting this safety-related equipment.

The program described in (b) above is not intended to be as extensive as the program in (a), but is intended to be a good faith, documented effort to periodically contact the vendors of key, safety-related components (such as auxiliary feedwater pumps, batteries, inverters, battery chargers, diesel generators, safety-related electrical switchgear, cooling water pumps, and valve operators), not already included in the interface program of (a) above, to obtain any technical information applicable to this.

Documented periodic contact via telephone is sufficient. It is expected that a reasonable and prudent review of operating experience, availability of vendor information, and component safety significance using insights obtained from generic or plant specific probabilistic risk analyses will yield a set of component vendors that will make up each licensee's program. In the event that vendors have gone out of business, cannot be identified, or will not supply information, the licensee or applicant should implement or continue to maintain a program that will assure that sufficient attention is paid to equipment maintenance, replacement, and repair to compensate for the lack of vendor backup such that equipment reliability commensurate with its safety function is assured.

CECo RESPONSE

CECo has reviewed and will modify its VETIP (as described in NOD Directive NOD-MA.3 Rev. 1) to:

- (a) Ensure that for all NSSS safety-related equipment, CECo receives all updates to instruction and maintenance manuals, technical information bulletins, revised test procedures, and updated replacement parts information. The program also includes provisions which ensure the receipt of all such vendor issued information pertinent to our safety-related equipment.
- (b) Ensure that for non-NSSS safety-related equipment, CECo maintains and documents periodic contact with the vendors of key, safety-related components (such as auxiliary feedwater pumps, batteries, inverters, battery chargers, diesel generators, safety-related electrical switchgear, cooling water pumps, and valve operators etc.), not already included in the interface program of (a) above, to obtain any technical information applicable to this equipment.
- (c) Ensure that, although not requested by the Generic Letter, CECo maintains and documents periodic vendor contact for that non-safety-related equipment contained in the Nuclear Plant Reliability Data System (NPRDS).

CECo's modification of its VETIP will reflect the requirements of 10 CFR Part 50, Appendix B; "Quality Assurance Criteria for Nuclear Power Plants."

SCHEDULE FOR IMPLEMENTATION

In keeping with the CECo corporate objective of utilizing limited discretionary resources such that improvement in plant safety is maximized, the following Generic Letter implementation schedule has been developed:

<u>TASK</u>	<u>COMPLETION DATE</u>
1. Issue NOD MA.3 Rev. 1	10/31/90
2. Perform those tasks outlined in (a) above for the 5 most safety significant systems at each station. These systems will be the INPO monitored safety systems and include: BWR's: HPCI System (D/Q) RCIC System (L/Q) LPCI System (D/L) Isolation Condenser System (D) RHR System (Q) Shutdown Cooling System (D) HPCS (L) ADS (L) Core Spray (Q) Emergency AC Power System (D/Q/L) PWR's: High Head Injection System Safety Injection System RHR System Auxiliary Feedwater System Emergency AC Power System	12/31/91
3. Perform those tasks outlined in (a) above for the remaining NSSS safety-related equipment at each station.	06/30/92
4. Perform those tasks outlined in (b) above for the non-NSSS safety-related equipment at each station.	12/31/94
NOTE: These actions will place CECo in full compliance with Generic Letter 90-03.	
5. Additionally, perform those tasks outlined in (c) above for the non-safety-related equipment contained in the NPRDS for each station.	05/31/95

The schedule outlined above will permit CECo to meet and exceed the requirements of Generic Letter 90-03.

GENERIC LETTER REPORTING REQUIREMENTS

Licenses and applicants are requested to review their present vendor interface programs and modify their programs as necessary to assure that both of the elements set out above are met. Pursuant to Section 182 of the Atomic Energy Act of 10 CFR 50.54(f), the NRC requires that licenses report to the NRC within 180 days of receipt of this generic letter whether or not they have taken the actions requested.

Licenses undertaking the actions requested should confirm that they have examined their vendor interface programs, that their programs either already include both of the elements set out in this letter or that the elements have been scheduled for implementation. If licensee actions are not complete at the time of their submittal, the licensee should submit a completion date for the remaining actions to be taken. If the licensee declines to undertake the actions requested by this letter, the licensee is required to provide justification for the position.

RESPONSE

This attachment fulfills the reporting requirements for Generic Letter 90-03. CECO will notify the NRC upon completion of each milestone (Tasks 2 through 5) listed in the schedule for implementation.