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October 24, 1989

Mr. A. Bert Davis Regional Administrator U.S. Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, IL 60137

> Subject: LaSalle County Station Units 1 and 2 Response to the SALP 8 Board Report NRC Docket Nos. 50-373 and 50-374

Reference (a): A.B. Davis letter to Cordell Reed dated August 28, 1989, Transmitting the LaSalle County Station SALP 8 Board Report Numbers 50-373/89001 and 50-374/89001.

Dear Mr. Davis:

Reference (a) transmitted the Systematic Assessment of License Performance (SALP) 8 Report for the LaSaile County Station and summarized the station's performance ratings for the period of March 16, 1988 through June 30, 1989. The purpose of this letter is to provide Commonwealth Edison Company's (CECo) comments as requested in Reference (a).

On September 28, 1989, representatives of CECo met with members of your staff to discuss the SALP 8 report.

CECo appreciates the NRC recognition of the high level of performance in the areas of Plant Operations and Emergency Preparedness and the improvement shown in the area of Security. We believe that this report reflects the effort LaSalle County Station has put forth to make improvements in performance.

In review of the SALP report the concern with the effectiveness of LaSalle Station's ALARA program in light of the high station dose in 1988 and the continual increases in collective doses between 1985 and 1988 was noted.

CECo shares the concern that Region III has with the man-rem accumulation at LaSalle Station in 1988. However, the high level (2471 man-rem) was in large part due to extensive drywell work during two separate refuel outages. This work included the Drywell Cooling Modification, and Snubber Reduction efforts. These snubber reduction efforts should result in an overall man-rem savings due to decreased inspections and testing in future years.

0340T:6

The Station and the Company have undertaken additional proactive efforts to reduce cumulative exposure. The proactive efforts at the station have focused on both short term and long term actions. These actions have been a direct result of extensive management assessments and evaluations by both corporate and LaSalle Station personnel. These evaluations commenced in mid-1988, during the spring refuel outage. Since that time, over 80 man-days have been spont during four specialized evaluations at LaSalle. The results of these evaluations, as well as in-station efforts, have been the identification and implementation of a broad range of improvement items. Current performance in 1989 has indicated that these efforts have been successful. Cumulative exposure through the middle of October (838 man-rem) is approximately 5% less than the year-to-date goal (887 man-rem). Year-end exposure is projected to meet or beat the year-end goal of 1400 man-rem. This represents a 43% reduction from the 1988 total.

LaSalle County Station and CECo believe that this improving trend will continue in the future. The Station and the Company also appreciate and welcome the planned efforts of the Commission in terms of additional analysis of the ALARA program. We are confident that both Brookhaven National Laboratory and the Regional Inspectors will come to the same conclusion.

We appreciate the efforts of NRC personnel and the Resident Inspectors in preparing the SALP Board report. LaSalle County expects to continue to achieve a high level of performance.

Please direct any questions regarding this transmittal to the Nuclear Licensing Department.

Very truly yours,

Web and D.P. Galle

Vice-President BWR Operations

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cc: P.C. Shemanski - Project Manager, NRR LaSalle County Senior Resident Inspector

0340T:7