Docket Nos 50-10 50-237, 00-249, 50-254 and 50-265

Commonwealth Edison Company
ATTN: Mr. Byron Lee, Jr.
Assistant to the President
Post Office Box 767
Chicago, Illinois 60690

Gentlemen:

Our review of previous submittals describing quality assurance programs at Dresden and Quad-Cities Stations indicates that the quality assurance programs as described must be revised to fulfill the requirements of Appendix B to 10 CFR Part 50. A quality assurance program for the Zion Station was submitted as Amendment No. 22 to the Final Safety Analysis Report. On November 3, 1972, the Commission issued Safety Guide No. 33, Quality Assurance Program Requirements (Operation), copy enclosed. These two documents should be used as basic guidance in revising your quality assurance programs. Deficiencies in your present quality assurance programs for Dresden Unit 1 are noted in the letter from Boyce Grier, Directorate of Regulatory Operations, to Byron Lee, Jr., dated October 19, 1972, and in the enclosed specific comments on your quality assurance program description dated June 23, 1971 (Docket No. 50-10). These documents should be used as additional guidance in developing an acceptable program.

Using the above noted documents as guidance, we request that you resubmit, as supplements to the Final Safety Analysis Reports, a proposed quality assurance program for the Dresden and Quad-Cities Stations that will fulfill the requirements of Appendix B to 10 CFR Part 50. Your program should be submitted within 60 days from the date of this letter with one signed original and fifty-nine additional copies.

Sincerely,

D. J. Elevani

Donald J. Skovholt
Assistant Director for
Operating Reactors
Directorate of Licensing

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Enclosures:

1. Specific Comments

2. Safety Guide No. 33

cc w/enclosures: J in W. Rowe, Esquire Isham, Lincoln & Beale Counselors at Law One Pirst National Plaza Chicago, Illinois 60670

Mr. Charles Whitmore
President and Chairman
Iowa-Illinois Gas and
Electric Company
200 East Second Avenue
Davenport, Iowa 52801

Morris Public Library 604 Liberty Street Morris, Illinois 60451 (For Docket Nos. 50-237 & 50-249)

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- AEC 338 Rev. 5:33 AECM 0240

SPECIFIC COMMENTS

- 1. QA Program for Operations for Dresden 1, submitted June 23, 1971
 - a. Each criterion should be addressed separately
 - b. Specific deficiencies are listed below:

Criterion	Items that should be addressed
V	 Activities affecting quality which are prescribed and accomplished by documented instructions, ro- cedures, or drawings, as appropriate.
	 Acceptance criteria established to assure that important activities have been accomplished satisfactorily.
XI	 A test program to assure that required testing is identified and performed in accordance with written test procedures.
	 Procedures which incorporate the requirements and acceptance limits as found in the FSAR and the Technical Specifications.
	 Proof tests prior to installation preoperational tests, and operational tests.
	 Provisions to assure that procedures cover all prerequisites.
	5. Adequate test instrumentation availability and use.
	 Tests performed under suitable environmental conditions.
	 Tests results documented and evaluated to assure that the test requirements have been satisfied.
XIV	 Systems (e.g., stamps, tags, labels, cards) to show the status of inspection, and tests of plant equipment.

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Criterion

Items that should be addressed

XIV

Measures to indicate which equipment has satisfactorily passed inspections and tests.

XVIII

- Audits performed in accordance with written procedures and checklists by trained personnel not having direct responsibility in the area being audited.
- Documentation and review of audit results by management having responsibility in the area audited.
- 3. A reaudit conducted in areas where deficiencies were noted.
- 2. Fuel Management: Discuss the quality assurance programs and quality control checks that are designed to assure the mechanical integrity of your fuel over its anticipated lifetime, including the design review effort, review and audit of quality assurance measures, and your planned inspections of the fuel upon delivery. Indicate how your QA program with respect to fuel design and fabrication will minimize possible failures from clad hydriding, clad collapse and UO2-clad interaction. Describe the efforts to apply the principles and practices of statistical quality control, reliability, and other recognized good practice in this area.

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