OCT 22 1982

Docket No. 50-373

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Vice President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

Thank you for your letter dated September 20, 1982, informing us of the steps you have taken to correct the noncompliances which we brought to your attention in Inspection Report No. 50-373/82-30 forwarded by our letter dated August 19, 1982. We examined these matters during Inspection No. 50-373/82-45 and found your corrective actions to be acceptable.

With respect to the additional comments you provided in your letter concerning noncompliance Items 1 and 2, we offer the following remarks:

- 1. In your response to the first item of noncompliance, you took exception to the NRC contention that you did not take prompt and effective corrective action to correct problems associated with the implementation and interpretation of the Technical Specifications. We agree that certain forms of corrective action were taken by you as documented in the individual Licensee Event Reports and that you had initiated On-Site Review of the LERs; however, these actions were not effective in correcting the problems as evidenced by the repetitive events. Comprehensive, effective corrective actions addressing the root causes of the problems were not initiated until requested by the NRC. You provided commitments to take those actions following a management meeting requested by us which was held in our office on June 11, 1982.
- 2. In your response to the second item of noncompliance, you provided an alternate description of the event involving inoperability of the Standby Gas Treatment System (SBGTS). Although your description is accurate in that a potential flow path existed which may have provided sufficient flow and that an alternate power source was available for the Division I SBGTS initiation logic, the existence of these conditions does not change the concerns expressed in the item of noncompliance. The fact remains that a safety-related system was unknowingly placed in a significantly degraded condition by a modification that was neither reviewed nor approved.

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Your cooperation with us is appreciated.

Sincerely,

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R. L. Spessard, Director Division of Project and Resident Programs

cc:
Louis O. DelGeorge, Director
of Nuclear Licensing
D. L. Shamblin, Site
Construction Superintendent
T. E. Quaka, Quality
Assurance Superintendent
G. J. Deiderich, Station
Superintendent
R. H. Holyoak, Project Manager

cc w/ltr dtd 9/20/82: DMB/Document Control Desk (RIDS) Resident Inspector, RIII Karen Borgstadt, Office of Assistant Attorney General

OFFICE	RIII & DW. Walker/jk	720	RIII		 ***************	
SURNAME	Walker/jk	Streeter	Spessara	****************	 ******************	******************
DATE	10/20/82	10/2482	10/22/82		 	