



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 23, 1993

Mr. David L. Meyer
Chief, Rules and Directives Review Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Commonwealth Edison comments on Proposed Generic Communication:
AVAILABILITY AND ADEQUACY OF DESIGN BASIS INFORMATION

Dear Mr. Meyer:

COMMONWEALTH EDISON RESPONSES:

1. We do not believe that a Generic Communication is required because this issue is presently being addressed per the NUMARC 90-12 Document and that any status or program information can be readily handled on the NRC Regional level. Technical issues should be more clearly handled on the Regional level without the imposition of the legalistic ramifications that will accompany information printed in the Federal Register.
2. If this Generic Communication must be published, a longer utility response time will be required for multi-unit utilities, and the legal status of utility responses must be clarified, and that the responses must allow for latitude in process improvements in the areas of Design Control.
 - A) At least 240 days should be allowed for the utility response window instead of only 120. At our utility we are performing and scheduling some major process evaluations in order to determine an optimum process for our control of design information. This process will be different for our older and newer stations. Our evaluations will not be completed in 120 days due to our outage schedules and related activities.
 - B) Control of design information is a complex issue. Our response to this proposed Generic Letter should not become a docketed commitment but should be treated as our best evaluation at the time of the response.
 - C) Our Design Basis Program has been undergoing continuous improvements. Any response to this Generic Letter must allow for flexibility to continue our process improvements.

Thank you for the opportunity to comment.

W.J. Groszko

Supervisor, Design Basis
and CM Group

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USNRC
ADMINISTRATIVE

TRANSMITTAL SHEET

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Date: 4/23/93

Transmittal Sheet Plus 1 Page(s)

To:

Organization / Station / Department: US NRC

Telecopy Number: (301) 504-2259

From: David Chrzanowski

Department:

- ☐ SAFETY REVIEW/ANALYSIS
- ☒ NUCLEAR LICENSING
- ☐ ON-SITE QV
- ☐ OFF-SITE QV
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NOTES

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