



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 29, 1994

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Commonwealth Edison Company Quality Assurance Program
Topical Report CE-1-A, Revision 65
Byron Units 1 and 2,
NRC Docket Numbers 50-454 and 50-455
Braidwood Units 1 and 2,
NRC Docket Numbers 50-456 and 50-457
Zion Units 1 and 2,
NRC Docket Numbers 50-295 and 50-304
Dresden Units 1, 2 and 3,
NRC Docket Numbers 50-10, 50-237 and 50-249
Quad Cities Units 1 and 2,
NRC Docket Numbers 50-254 and 50-265
LaSalle Units 1 and 2,
NRC Docket Numbers 50-373 and 50-374

Dear Mr. Russell:

Pursuant to 10 CFR 50.54, Commonwealth Edison Company (CECo) is transmitting Revision 65 of the Quality Assurance Program Topical Report, CE-1-A, dated March 25, 1994. This report reflects organizational changes, expands the descriptions of the audit and augmented quality functions, and adds a description of the offsite and onsite review and investigative function. A general description of the changes and their bases is included in Attachment A. A list of specific changes is included in Attachment B.

The changes proposed in the Topical Report have been previously discussed with Staff members from NRR and Region III during a March 8, 1994 meeting in Washington D.C. As stated during this meeting, it is CECo's position that the subject organizational changes will enhance the effectiveness of the Quality Verification Organization and fully comply with the organizational requirements of 10 CFR 50 Appendix B. Based on this discussion, however, CECo will defer implementation of the proposed changes until NRC approval is received.

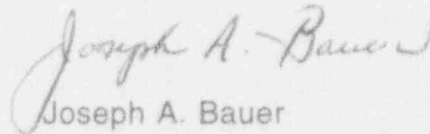
9404070330 940329
PDR ADOCK 05000010
P PDR

0004

Subsequent to approval of Revision 65 of the Topical Report, there may be cases where the Topical may be less restrictive than corresponding sections of the Stations' Technical Specifications. In these instances, the requirements of the Technical Specifications shall supersede the Topical until an appropriate license amendment is approved.

Please direct any comments or questions to this office.

Sincerely,



Joseph A. Bauer
Nuclear Licensing Administrator

JAB/gp

Attachments

cc: J. B. Martin, Regional Administrator-RIII, (2 copies)
G. F. Dick, Byron Project Manager - NRR

ATTACHMENT A

General Description of Changes

Realignment of the Organization and Revision to Titles

Description and Bases of the Realignment of the Organization and Revision to Titles

CECo proposes to realign a portion of its organization and revise several management titles to reflect the changes. CECo developed the new organization to support and sustain excellent performance at each nuclear station. The change affects several of the titles in the Topical Report, as well as the assignment of some responsibilities to specific individuals and organizations.

Basis for Realignment

Commonwealth Edison Company is constantly examining its organizational structure to take advantage of those opportunities where work groups and individuals have the greatest amount of autonomy, authority, and flexibility to achieve high levels of quality and nuclear safety. To that end the Nuclear Operating Division instituted a two step realignment process to restructure the Nuclear Oversight Department with the expressed purposes of improving quality and the margin of safety.

Step one of the process took place when the Company established the position of the Site Quality Verification Director. The Site QV Director is responsible for managing one of six Site Quality Verification Departments and is accountable for the performance of the quality verification program at their respective location. The SQV Directors integrate all aspects of the oversight function including: safety engineering, quality assurance, and performance analysis. The position is on a par with senior station management and the Director's office is located in near proximity to the plant and operating managers' offices. The SQV Directors assure the most efficient utilization of evaluative resources to provide a strategic overview of site activities. They have a strong tie to Corporate oversight and follow the policies and directives of senior Nuclear Oversight management. By being on site, they have the opportunity to model and encourage behavior that emphasizes quality. The six people chosen to fill the SQV Director positions were selected based upon a history of demonstrated performance, credibility, and influence.

Concurrent with the Company establishing the Site QV Director position, additional experienced personnel were assigned to augment the site groups. Their expertise enhanced the value of the oversight function by assisting in the integration of the quality, safety, and monitoring processes. They apply their collective knowledge by participating in a program of aggressive oversight and plant presence.

The second, logical step of the realignment will occur as the Company changes the reporting relationship of the SQV Director and staff from the Nuclear Oversight Manager to the Site Vice President. This step establishes single point accountability with the Site Vice President (i.e. all major functions are under his management) and clearly strengthens SQV's role in implementing independent, self-assessment (not just audit) throughout the Nuclear Division. As part of the station organization, SQV and the station become team members in the discovery of problems and in the evaluation of actions for improvement.

Impact of the Change

The change in the reporting relationships have a positive impact on nuclear safety by enhancing managerial attention, focus, and oversight of each affected area. In addition personnel accountability, consistency, continuity and performance will be enhanced.

The CECo Quality Model emphasizes how the first two filters of quality (worker and supervisor self-assessment) are the most important in detecting and correcting problems. This realignment positively influences the self-assessment process by placing the third filter (critical self-assessment) directly within the site organization.

Even though the QV organization will be under the authority of the site organization, the SQV organization will retain sufficient organizational freedom, authority, and responsibility to provide an independent, onsite assessment of station line and support activities to ensure compliance with quality assurance and nuclear safety requirements. The SQV director will continue to have stop work authority.

A strong link between the site and corporate groups will be maintained through the leadership of the Nuclear Oversight Manager who maintains the authority and responsibility for quality assurance and nuclear safety policy. Should a significant nuclear safety or quality issue develop, requiring escalated action, the Site QV Director will direct the issue through the Nuclear Oversight Manager to the Chief Nuclear Officer. The Nuclear Oversight Manager will continue to submit a report on the status, adequacy, and implementation of the quality assurance program to the Chief Nuclear Officer.

Inclusion of the Description of the Audit Function found in the Technical Specifications and Changes to the Audit Frequencies

Description and Bases of the Current Requirement

The Company's Technical Specifications describe the station audit function and provide audit frequencies for a variety of safety-related functions. The basis for the audit function is to provide an independent overview of safety-related activities in conformance with 10CFR50, Appendix B.

Description of the Revision

The proposed change would revise the Topical Report to include the description of the audit function as contained in section 6.5 of the Technical Specifications. The description would be modified to remove the requirements for the audits of the emergency plan and the security plan and their implementing procedures; remove the requirement for an outside independent consultant to audit fire protection equipment and program implementation every third year; and would assign a maximum audit frequency of 24 months to each audit item in the required audit list.

Bases of the Change

The proposed changes are based upon a re-examination of the requirements for conducting quality assurance audits and NRC guidance. The basis for conducting the audits remains unchanged.

The change to remove the audit of the emergency and security plans and their implementing procedures from the listing is consistent with the guidance contained in Generic Letter 93-07 "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans."

The change to remove the independent triennial audit of fire protection is proposed because this audit is required in addition to two other fire protection audits already performed by CECO personnel. These two audits cover the facility fire protection programmatic controls, including implementing procedures, and fire protection equipment and program implementation. CECO's Site Quality Verification Departments or Nuclear Oversight Department has sufficient resources, experience, and independence to perform credible, objective fire protection audits without outside assistance.

CECo initially implemented the fire protection program audit frequencies based on the recommendations of Generic Letter 82-21, "Technical Specifications for Fire Protection Audits." The triennial audit is not mandated by any fire code or federal regulation, and the frequency is no longer specified in Standard Technical Specifications.

The change in the audit frequencies is based upon a re-examination of the requirements for conducting quality assurance audits. 10CFR50, Appendix B requires a comprehensive system of planned and periodic audits to verify compliance with all aspects of the Quality Assurance Program and to determine the effectiveness of the Program. Several other documents such as ASME NQA-1, Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants (NUREG-0800), NRC Instruction 2515/78, and NUREG/CR-5151 provide supporting guidance and recommendations to interpret the requirements of Appendix B.

In general, these documents require audits to be scheduled at frequencies commensurate with the status and safety significance of the activity being reviewed. Successful verification programs use a "living" schedule that permits important plant activities and events to be verified and documented as they are occurring, or shortly thereafter, to provide for the greatest impact and most effective follow-up. Scheduling is to be dynamic and resources are to be supplemented when Quality Assurance Program effectiveness is in doubt.

While none of these documents address the use of rigid time schedules to verify quality, they do obligate the licensee to apply evaluative resources dynamically, so that important safety issues can be addressed effectively. By removing the required audit frequencies and scheduling audits driven by demonstrated performance, CECO would better meet the intent of the regulatory guidance.

CECo currently complies with Regulatory Guide 1.33, "Quality Assurance Program Requirements(Operations)", which endorses ANSI N18.7-1976/ANS-3.2. Section C.4 of Regulatory Guide 1.33 states:

"Section 4.5, "Audit Program," of ANSI N18.7-1976/ANS-3.2. states that audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to ensure that an audit of all safety-related functions is completed within a period of 2 years. In amplification of this requirement, the following program elements should be audited at the indicated frequencies:

- a. The results of actions taken to correct deficiencies that affect nuclear safety and occur in facility equipment, structures, systems, or method of operation - at least once per 6 months.*

b. *The conformance of facility operation to provisions contained within the technical specifications and applicable license conditions - at least once per 12 months.*

c. *The performance, training, and qualifications of the facility staff - at least once per 12 months."*

CECo respectfully proposes to take exception to this provision of Regulatory Guide 1.33.

In lieu of specifying individual audit frequencies, a general requirement would be instituted such that audits are conducted with a minimum 24 month frequency. In support of the general requirement, the Topical Report specifies that the Nuclear Oversight Manager or Site Quality Verification Director, as appropriate, will approve audit schedules that include the minimum audit areas and frequencies. Schedules are to be reviewed semiannually and revised as needed to assure that coverage is sufficient. Audits are initiated early to assure effective quality assurance. Additional unscheduled audits may also be performed at various stages of activities, based on the nature and safety significance of the work being done, to verify continued adherence to and effectiveness of the quality systems.

Several inputs are used for scheduling audits. The inputs include, but are not limited to, observation of plant activities, trends of plant performance parameters, trends of significant personnel performance inadequacies (including the use of preselected causal factors), an integrated database that tracks low level events, industry experience, INPO evaluation results, and NRC inspection reports. As a result, areas that demonstrate consistently high performance would typically be audited less frequently than other areas.

The proposed change will not exempt CECO from any requirements to comply with other applicable rules and regulations, such as those included in the Code of Federal Regulations. The proposed change is also consistent with the Standard Technical Specifications in that no specific audit schedules are cited.

Impact of the Change

Removing the audit of the emergency and security plans and their implementing procedures from the audit listing has no effect because the audits will continue to be conducted in accordance with 10CFR50.54(t), 10CFR50.54(p)(3), 10CFR73.55(g)(4) and 10CFR73.40(d).

Deleting the requirement to have an independent fire protection consultant perform an audit of fire protection equipment and program implementation at least every third year will not diminish the effectiveness of the fire protection audits. CECo's Quality Verification Department or Nuclear Oversight Departments, which would perform fire protection audits based on regulatory requirements and performance, has sufficient resources, experience, and independence to perform credible, objective fire protection audits without outside assistance. CECo will retain the option of using an independent consultant to perform an audit.

Qualified individuals independent of CECo's staff will continue to critique a randomly unannounced fire drill every 3 years as specified in 10CFR50, Appendix R, I.3.d.

The proposed change of assigning a general audit frequency of 24 months will have a positive impact on plant safety. Resources will be shifted, in a performance based manner, to more productive safety functions. When evaluative resources are allocated to competing risks, the overall safety of the plant is improved because available resources can be focused on weak areas to improve performance.

Change to the Offsite Review Process

Description and Bases of the Current Requirement

The Company's Technical Specifications describe the offsite review and investigative function and provides review requirements for a variety of safety-related items. The basis for the offsite review function (ie. to provide an independent overview of safety-related, station activities) may be found in the following documents: ANSI N18.7-1976/ANS-3.2 "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants"; ANSI/ANS-3.2-1988, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants"; Regulatory Guide 1.33, Revision 2, "Quality Assurance Program Requirements (Operations)"; and Standard Technical Specifications.

Description of the Revision

The proposed change would revise the Topical Report to include the description of the offsite and onsite review function as contained in section 6.5 of the Technical Specifications. The description would be modified to remove the requirement that the Director of Safety Review select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function. In its place, the Director of Safety Review would assure that a cross disciplinary review determination is made for each item to be reviewed and assure that cross disciplinary offsite reviews are performed by qualified personnel of the appropriate disciplines when deemed necessary.

The proposed change allows senior participants to perform reviews themselves or, when deemed necessary, to use a cross disciplinary review. Guidance would be provided in administrative procedures to ensure that the level of review is appropriate. The Director of Safety Review would continue to approve and report all findings of noncompliance with NRC requirements.

Bases of the Change

The proposed changes are based upon a re-examination of the requirements for conducting offsite reviews. The basis for conducting offsite reviews remains unchanged.

A review of ANSI N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," ANSI/ANS-3.2-1988, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," Regulatory Guide 1.33, Revision 2, "Quality Assurance Program Requirements (Operations)," and the Standard Technical Specifications identified no specific requirements regarding the number of individuals who must participate in each review. The documents allow flexibility in the organizational structure for meeting the review and investigative function. They do, however, require that the reviews be performed independently of the organization performing the activities being reviewed.

Impact of the Change

The proposed change clarifies the reviewer's role and improves individual accountability. Eliminating unnecessary multiple reviews allows reviewers to focus on areas in need of improvement and make recommendations to enhance nuclear safety and plant reliability.

ATTACHMENT B

Specific Changes

General

Changes addressing Improved punctuation, readability, and typographical errors, that have no effect on content, are not included in this list.

Preface\Policy

1. Changed the title of the **Vice President and Chief Nuclear Officer** to the Senior Vice President and Chief Nuclear Officer.

Section 1

2. Clarified that the Nuclear Oversight Manager is responsible for corporate quality assurance policy and corporate nuclear safety policy.
3. Included the Site Quality Verification Director as one of those delegated to release a "stop work" action.
4. Changed all references to the Engineering and Construction Department to Nuclear Engineering and Technical Services where those changes were inadvertently left out of the approved revision 64 of the CECo Topical Report.
5. Changed Department name from **Systems Material Analysis** to **System Materials Analysis**.
6. Included Site Quality Verification personnel with those who are responsible for notifying the Nuclear Oversight Manager of conditions which are adverse to quality that require prompt action when required corrective action cannot be agreed upon.
7. The Senior Vice President and Chief Nuclear Officer has assumed the responsibility to assure resolution of disagreements in accordance with the ASME Code and the Quality Assurance Program, if necessary.
8. The position of **Vice President, Nuclear Oversight and Regulatory Support** is no longer responsible for resolving disagreements. In addition, all reference to this title was changed to the **Vice President of Nuclear Operations Support** where such changes were inadvertently left out of the approved revision 64 of the CECo Topical Report.

9. Clarified the authority the Company may assign an Independent Inspection Agency to overview work occurring at offsite supplier's plants.
10. Changed the responsibility for establishing a Site Quality Verification group from the **Nuclear Oversight Department** to the **Company** for new project construction.
11. Replaced references to **Onsite Quality Verification** with **Site Quality Verification**.
12. Clarified and generalized the responsibility of the Chairman and Chief Executive Officer for overall corporate policy.
13. Added the position of the Senior Vice President and Chief Nuclear Officer to the staff of the Chairman and Chief Executive Officer.
14. Added the Senior Vice President (Fossil Generation and Fuel) to the staff of the Chairman and Chief Executive Officer.
15. Eliminated the position of the **Senior Vice President (Energy Facilities)**.
16. Changed the name of **Environmental Affairs** to **Environmental Services**.
17. Changed the title of the **Director, Corporate Security** to **Director of Corporate Security**.
18. Changed the title of the **Manager, Purchasing** to **Manager of Purchasing**.
19. Clarified the responsibility of the Senior Vice President and Chief Nuclear Officer to include overall plant nuclear safety.
20. Added the position of Interim Executive(s) to the staff of the Senior Vice President and Chief Nuclear Officer.
21. Added the position of Nuclear Oversight Manager to the staff of the Senior Vice President and Chief Nuclear Officer and removed it from the staff of the Vice President of Nuclear Operations Support.
22. Added a description for the responsibilities of the Interim Executive(s).
23. Clarified the responsibility of the Site Vice President to include compliance with nuclear safety policies.

24. Clarified the role of the Site Vice President to be consistent with 10CFR50 Appendix B requirements.
25. Added the newly created position of **Site Quality Verification Director** to the staff of the Site Vice President.
26. Changed the title of the **Outage Planning Director** to **Long-Range Work Control Superintendent**.
27. Clarified the time period for designating an alternate when the Plant Manager is unavailable.
28. Assigned the responsibilities for onsite assessment to ensure compliance with Quality Assurance and Nuclear Safety requirements, onsite stop work authority, and escalation of significant quality and safety issues to the Site Quality Verification Director. Enhanced the description to clarify independence.
29. Added the newly created positions of **Independent Safety Engineering Group Supervisor** and **Integrated Analysis Administrator** to the staff of the Site Quality Verification Director.
30. Changed the title of the **Site Quality Verification Superintendent** to **Site Quality Verification Supervisor** and added the position to the staff of the Site Quality Verification Director.
31. The responsibilities of the Vice President of Nuclear Operations Support have been revised to eliminate those concerning nuclear oversight and quality assurance advisor activities.
32. The position of the **Performance Monitoring and Improvement Manager**, reporting to the Vice President of Nuclear operations Support, was eliminated.
33. The position of the Nuclear Oversight Manager, reporting to the Vice President Operations Support, was changed to report to the Senior Vice President and Chief Nuclear Officer.
34. Changed the title of the **Director of Strategic Licensing Policies and Issues** to **Director of Strategic Licensing Policies and Regulatory Performance**.

35. Changed the title of the **Emergency Preparedness and State Programs Director** to **Emergency Preparedness Director**.
36. Eliminated the position of the **Regulatory Performance Director**.
37. Transferred the responsibilities of the **Regulatory Performance Director** to the **Director of Strategic Licensing Policies and Regulatory Performance**.
38. Changed references to the Nuclear Operations Division to the Nuclear Operations organization in several instances.
39. Changed the title of the **Electrical Instrumentation and Engineering Supervisor** to **Electrical Instrumentation and Control Engineering Superintendent**.
40. Changed the title of the **Engineering Performance and Improvement Director** to **Engineering Performance and Improvement Superintendent**.
41. Changed the title of the **Mechanical Structural Design Supervisor** to **Mechanical and Structural Engineering Superintendent**.
42. Changed the title of the **PRA and Reliability Engineering Supervisor** to **PRA, Reliability Engineering and Design Administration Superintendent**.
43. Changed the title of the **Parts Stores Supervisor** to **Nuclear Stores Director**.
44. Changed the title of the **Nuclear Construction Supervisor** to **Nuclear Construction Superintendent**.
45. Clarified the responsibilities of the Nuclear Oversight Manager to include: developing, maintaining, and interpreting nuclear safety policies, procedures and implementing directives; the vendor audit program; and conducting audits of the Corporate organizations, responsible for nuclear functions, and the Site Quality Verification organization to verify that the Quality Assurance Program is being effectively implemented.
46. Clarified the responsibilities of the Nuclear Oversight Manager for avoiding unsafe plant conditions.
47. Clarified the responsibilities of the Nuclear Oversight Manager to include certifying authority for audit personnel.

48. The staff of the Nuclear Oversight Manager was revised to include the Corporate Quality Verification Director and the Director of Quality Assurance Policy and Support; and remove the Director of Quality Verification.
49. Changed the title of the **Off-Site Quality Verification Director** to **Corporate Quality Verification Director**.
50. Changed the title of the **Quality Assurance Policy Director** to **Director of Quality Assurance Policy & Support**.
51. The position of the **Director of Quality Verification** and its staff positions of the **Independent Safety Engineering Group Superintendent** and **Quality Assurance Superintendent** were eliminated.
52. The responsibilities of the Director of Quality Assurance Policy & Support were revised to include establishing the requirements for auditor certification.
53. Added a description of the responsibilities of the Senior Vice President (Fossil Generation and Fuel).
54. Added the position of the **Vice President Fossil operations** to the staff of the Senior Vice President (Fossil Generation and Fuel).
55. Revised the organization charts.

Section 2

56. Revised the minimum requirement for submitting changes in the Quality Assurance Program document (ie. the Topical Report) to the Nuclear Regulatory Commission for changes, editorial changes, reassignments which do not reduce commitments from annually to at least once every two years.

Note: This revision is consistent with the revised 10CFR50.54(a)(3).

Section 3

57. Included the Nuclear fuel Services Department in the Responsibilities paragraph.

Sections 4, 5, and 6.

58. No substantial changes.

Section 7

59. Changed QA Organization to Site Quality Verification or Nuclear Oversight.

Sections 8, 9, and 10

60. No substantial changes.

Section 11

61. Changed the word siting to site selection.

Section 12

62. No substantial changes.

Section 13

63. Clarified the handling of items.

Sections 14, 15, 16, and 17

64. No substantial changes.

Section 18

65. The Site Quality Verification was added under Responsibilities.

66. The responsibilities of the Nuclear Oversight Manager were further clarified to include the responsibility for the performance of periodic audits to determine that Quality Assurance and Nuclear Safety Policy is being carried out.

67. The independence of the Site Quality Verification Director was clearly established.

68. Provisions for performance based audits were established.

69. The responsibilities of the Site Quality Verification Director were revised to include the approval of audit schedules for his location.
70. The responsibilities of the Site Quality Verification Director and the Corporate Quality Verification Director were revised to include approval of their respective agenda, checklist, findings, and report of each audit.
71. A listing of required audits and minimum frequency was included.

NOTE: The listing is based upon a compilation of all the audits required by the Technical Specifications of the twelve, Commonwealth Edison Company, operating nuclear power plants. The frequency differs from Technical Specification requirements in several instances. The frequency included in this revision to the Topical Report will be included with a proposed amendment to the Company's many operating licenses.

72. Clarified that recommendations and findings of each audit shall be reported to the Station manager, the appropriate Site Vice president, and the Nuclear Oversight Manager.
73. Clarified that all findings of noncompliance with NRC requirements, and any significant nuclear safety or quality issue, requiring escalated action, will be directed through the Nuclear Oversight Manager to the Senior Vice President and CNO.
74. Added that all copies of documentation, reports, and correspondence are kept on file at the appropriate location.

NOTE: Items 71, 72, and 73 were included with this revision to the Topical Report to be consistent with a proposed amendment to the Company's many operating licenses that involves the relocation of a portion of some Technical Specification requirements to owner controlled documents.

Section 19

75. Changed references to Radiation Protection to Health Physics.
76. Added new paragraphs concerning repairs and alterations subject to the Illinois Department of Nuclear Safety's jurisdiction.

Section 20

77. Added a new Section 20 concerning the Onsite and Offsite Review and Investigative Function.

NOTE: The new Section is based upon a compilation of those parts of the Commonwealth Edison Company, twelve operating nuclear power plant's Technical Specifications that concern the Onsite and Offsite review and investigative function. Most of the text and intent was transferred directly with one major exception. The Technical Specifications typically require that a compliment of more than one participant, who collectively possess background and qualifications in the subject matter under review, provide comprehensive, interdisciplinary review coverage. This new Section would revise that requirement to assure that a cross disciplinary review determination is made for each item to be reviewed. This new Section was included with this revision to the Topical report to be consistent with a proposed amendment to the Company's many operating licenses that involves the relocation of a portion of some Technical Specification requirements to owner controlled documents.

Appendix A

78. Changed the definition of Offsite Review from offsite review and approval function to offsite review and investigative function.
79. Changed the definition of Onsite Review from onsite review and approval function to onsite review and investigative function.
80. Removed the definition for the On-Site Quality Verification Engineer or Inspector and replaced it with a definition for the Site Quality Verification Engineer or Inspector.

ASME Code Interface

81. Specified that the Nuclear Oversight and Site Quality Verification Departments are empowered to assure compliance with the ASME Code.
82. Transferred the responsibility for stamping from the Onsite Quality Verification Superintendent to the Site Quality Verification Director.

83. Changed the title of the **Drawing and Document Control Center** to the **Central Drawing Facility**.
84. Changed Quality Verification to Corporate Quality Verification.
85. Changed all references to the Technical Staff Supervisor to the Systems Engineering Supervisor where those changes were inadvertently left out of the approved revision 64 of the CECo Topical Report.
86. Changed all references to the System Operational Analysis Department to the T&D Operational Analysis Department where those changes were inadvertently left out of the approved revision 64 of the CECo Topical Report.