



Commonwealth Edison

Quad Cities Nuclear Power Station
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April 14, 1994
ESK-94-002

Mr. Jack B. Martin
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Subject: Quad Cities Nuclear Power Station Units 1 and 2;
Response to SALP 11 Report and Meeting;
Inspection Report Nos. 50-254(265)/95001;
NRC Docket Numbers 50-254 and 50-265

- References: (1) J. B. Martin letter to M. J. Wallace dated February 2, 1994
transmitting the NRC SALP 11 Report.
- (2) J. L. Schrage letter to J. M. Taylor dated March 7, 1994
transmitting the Quad Cities Management Plan.

Dear Mr. Martin:

This letter forwards Quad Cities' response to the Nuclear Regulatory Commission's SALP 11 Report (reference (1)) and the meeting held on February 15, 1994. The SALP 11 period encompassed Quad Cities performance from June 1, 1992, through December 25, 1993. Commonwealth Edison acknowledges and accepts the deficiencies identified in the SALP 11 Report and, as explained below, has initiated comprehensive improvement efforts to address them.

To ensure that Quad Cities achieves enduring performance improvement, we have adopted a strategy of accomplishing deliberate, measurable actions that are consistent with our ability to successfully complete them in a timely manner.

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The plan for implementing this strategy has been evolving since our response to the DET Report. That response cross-referenced the 1993 Management Plan and indicated that the plan would likely be modified as improvement actions were taken. An initial modification was provided to you in the 1994 Quad Cities Management Plan.

The attached "Quad Cities Station Course of Action" (COA) is our SALP response. Its purpose is to focus the Quad Cities Team on accomplishing a sustained level of improved performance and to provide further clarification of our strategy.

The COA was derived from a systematic assessment and comprehensive review of site performance and information dating back to January 1992. It includes information from internal audits, self-assessments, the integrated reporting program, Vulnerability Assessment Team, BDT and DET reports and many other sources. As a result, the actions enumerated in the COA encompass previous actions identified in the Management Plans.

Implementation of these actions will now follow the three year mid-term improvement strategy, the COA. Annual Management Plans will provide more detailed descriptions of how the COA is being implemented.

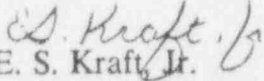
In addition to the mid-term improvement strategy, Quad Cities is also conducting the other elements of the Commonwealth Edison Integrated BWR Strategy. The immediate strategy (one year) focuses upon the current problems associated with declining performance including material condition deficiencies, radiation protection issues, problem identification weaknesses, and human performance problems. CECO has established targets to measure the results of the immediate strategy initiatives to ensure that there is an adequate rate of improved performance and reversal of trends. The mid-term phase, COA, will address the underlying root causes of declining performance identified at Quad Cities. The long-term strategy focuses on the attainment of a high level of performance consistent with CECO's five year business plan. Our Integrated BWR Strategy, the COA and the annual management plan is comprehensive and addresses the issues identified in the SALP 11 Report.

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We are confident that the underlying root causes of the SALP 11, BDT and DET findings will be resolved via this Integrated Strategy. CECo already has taken a significant step towards addressing and resolving the issues identified in the SALP Report by strengthening the leadership team and practices at the Site and improving the Station's materiel condition. Near-term improvements are included in the COA and the Station has made progress in the resolution of items identified in the NRC Region III Review of the DET (Inspection Report 94-004, issued 17 March 1994). To date, of the 59 items identified by the Region, Quad Cities has taken action and has 30 issues being prepared for closure, and 27 items moving towards completion. The remaining two issues are being reviewed for necessary corrective actions and assignment of completion dates.

Should your staff have any questions or comments concerning this response, please refer them to me at Quad Cities Station (309) 654-2241, extension 3600.

Very truly yours,


E. S. Kraft, Jr.
Site Vice President
Quad Cities Station

Attachment: Quad Cities' Course of Action

cc: Document Control Desk
C. Patel, Project Manager, NRR
C. Miller, Senior Resident Inspector, Quad Cities