

November 18, 1982

Docket No. 50-295  
Docket No. 50-304

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

Gentlemen:

This refers to the management meeting held by me and other NRC representatives with Mr. Cordell Reed and other representatives of Commonwealth Edison Company on June 2, 1982, to review the results of the NRC's assessment of the utility's regulatory performance at the Zion Nuclear Power Station in connection with NRC Manual Chapter 0516 - Systematic Assessment of Licensee Performance (SALP), covering the period July 1, 1980 to December 31, 1981.

A preliminary copy of the SALP Report was provided for your review in advance of our meeting. The final SALP Report is enclosed which includes the SALP Board Chairman's letter to you and your written comments concerning the report.

In addition to the assessments and recommendations made by the SALP Board contained in the enclosed SALP Report, I wish to give you my overall observations and assessment relative to the utility's regulatory performance during the assessment period:

1. With respect to the SALP ratings, the Regional SALP Board views the Category 2 rating as the rating which it anticipates most licensees will achieve. A Category 1 rating is given only for superior performance and there is reasonable expectation that it will continue. A Category 3 rating is given when the licensee's performance is considered minimally acceptable and identified weaknesses warrant special licensee management and NRC attention.

2. It is my view that the overall regulatory performance of the Commonwealth Edison Company at the Zion Nuclear Station is satisfactory. However, I concur with the SALP Board's findings that there are areas that need improvement, particularly with respect to the control of activities in the plant and the timely resolution of plant equipment problems. The need for improvement in the control and conduct of activities is evident in the SALP Report analysis sections, particularly for Maintenance and Modifications which show problems caused by activities in these areas. Regarding timeliness, even though you are taking assertive action, for example, on the vital inverter problem, control air quality and radioactive gas control, it appears to me that problems in these areas should have been resolved earlier.

Thank you for your letter dated June 18, 1982, in which you transmitted comments, clarifications and corrections to the Zion SALP Report. As you point out, an additional number of positive attributes could have been included in the Report. We try to include such items when we are aware of them, but, as you know, our resources are directed primarily at identifying problems.

Corrections to the Report are included in the report Errata Sheet. Please note, however, that the overall conclusions in the Report did not change.

Relative to your concern for more definitive assessment standards, there is not much to add that has not already been discussed in our meetings. You were furnished a copy of NRC Manual Chapter 0516 which describes the SALP criteria and guidance. The SALP Board reviews the integrated collection of data and observations in an attempt to assure a fair assessment and consistent application of the criteria. We acknowledge that the process may not adequately assess all the various attributes of a licensee and some of the guidance may be applied subjectively. While we respect your comments and are attempting to improve SALP, the SALP process is not intended to be an accounting type of exercise against specific criteria, nor is it intended to be purely consultative to the extent of pointing out what must be done to rise above a satisfactory level. The SALP process attempts to categorize management's regulatory performance during the rating period from the NRC perspective to help set priorities on our efforts and resources and provide guidance to licensee management. These findings are shared with licensees in an effort to help them improve their performance in the areas where we have identified concerns.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the SALP Report will be placed in the NRC's Public Document Room.

No reply to this letter is required; however, should you have any questions concerning these matters, we will be pleased to discuss them with you.

Sincerely,

**Original signed by  
A. Bert Davis**

James G. Keppler  
Regional Administrator

Enclosure: SALP Reports  
No. 50-295/82-16 and  
No. 50-304/82-14

cc w/encl:  
Louis O. DelGeorge, Director  
of Nuclear Licensing  
K. L. Graesser, Station  
Superintendent  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
Karen Borgstadt, Office of  
Assistant Attorney General  
Mayor John B. Spencer  
City of Zion

RIII K Tambling/sv 11/30/82 17	RIII X Spessard 11/18	RIII Norelius 11/17/82	RIII C/B Hind 11/17/82	RIII D Davis 11/17	RIII D for Keppler 11/17
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