

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-10/83-03; 50-237/83-04; 50-249/83-03; 50-254/83-03;
50-265/83-03; 50-295/83-03; 50-304/83-03; 50-373/83-04;
50-374/83-02; 50-454/83-04; 50-455/83-04; 50-456/83-01;
50-457/83-01

Docket Nos. 50-10; 50-237; 50-249; 50-254;
50-265; 50-295; 50-304; 50-373;
50-374; 50-454; 50-455; 50-456;
50-457

License Nos. DPR-10; DPR-19;
DPR-25; DPR-29;
DPR-30; DPR-39;
DPR-48; NPF-11;
CPR-100; CPR-130;
CPR-131; CPR-132;
CPR-133

Licensee: Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Vice President
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Facility Names: Dresden 1; Dresden 2; Dresden 3; Quad-Cities 1; Quad-Cities 2;
Zion 1; Zion 2; LaSalle 1; LaSalle 2; Byron 1; Byron 2;
Braidwood 1; Braidwood 2

Inspection At: NRC Region III Office

Inspection Conducted: January 26, 1983

Inspector: *R. D. Walker for*
W. G. Guldemon

February 15, 1983

Approved By: *R. D. Walker*
R. D. Walker, Chief
Projects Section 2C

February 15, 1983

Inspection Summary

Inspection on January 26, 1983 (Report No. See the list of 13 above)

Areas Inspected: Management Meeting conducted in the NRC Region III office to discuss proposed Commonwealth Edison Company guidelines for Commonwealth Edison Company personnel to be used for providing information to NRC Region III inspectors. This inspection/meeting involved a total of 26 inspector-hours being expended at the NRC Region III office.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

a. NRC Representatives

1. Mr. A. B. Davis, Deputy Regional Administrator
2. Mr. R. L. Spessard, Director, Division of Engineering
3. Mr. R. C. Knop, Chief, Projects Branch 1
4. Mr. J. F. Streeter, Chief, Projects Branch 2
5. Mr. D. H. Danielson, Chief, Materials and Processes Section
6. Mr. R. D. Walker, Chief, Projects Section 2C
7. Mr. C. C. Williams, Chief, Plant Systems Section
8. Mr. J. A. Grobe, Project Inspector
9. Mr. J. Hinds, Project Inspector
10. Mr. L. G. McGregor, Senior Resident Inspector, Braidwood Station
11. Mr. W. G. Guldemon, Senior Resident Inspector, LaSalle County Station
12. Mr. S. H. Lewis, Regional Counsel

b. Commonwealth Edison Representative

1. Mr. L. O. DelGeorge, Staff Assistant to the Assistant Vice President, Commonwealth Edison Company

2. Management Meeting

On January 26, 1983, a Management Meeting was held at the NRC Region III office between the NRC representatives and the Commonwealth Edison representative listed in Paragraph 1. The meeting was prompted by a December 15, 1982 letter from Mr. L. O. DelGeorge of Commonwealth Edison to Mr. A. B. Davis of the NRC outlining proposed guidelines for use by Commonwealth Edison personnel in dealing with information requests from NRC inspectors. Six specific types of information requests were addressed in the letter: verbal requests; document requests; analysis requests; justification of design details, operating procedures, etc; attendance at regular meetings.

Mr. Davis opened the meeting by noting that the guidance in the December 15, 1982 letter could be construed to limit NRC's free access to sources of information necessary to verify compliance with regulatory requirements. He further indicated that such a position was untenable and noted he understood that this was not the intent of Commonwealth Edison.

In response, Mr. DelGeorge stated that it was not the intention of Commonwealth Edison to limit NRC access to information. The December 15, 1982 letter contained draft guidance for managing the transfer of information to NRC Region III personnel as the regionalization of licensing activities progressed and in response to specific problems which had been encountered during the course

of NRC inspections and investigations at various Commonwealth Edison sites.

The subjects discussed in the December 15, 1982 letter were resolved by discussions as follows:

a. Verbal Information Requests

Mr. DelGeorge stated that the guidance provided was intended to establish a limit on the amount of effort to be expended on a verbal request for information. Beyond that limit, a formal written request might be requested. This position was assumed to ensure that such information requests were reviewed and deemed necessary by cognizant NRC management personnel.

Mr. Davis concurred with this approach in principle, noting that Region III has adopted a similar position for internal information requests. However, each request had to be judged on its own merit. He further stated that, irrespective of the guidelines, Commonwealth Edison had the option of appealing a verbal request to the cognizant Region III Section Chief, Project Office Management, and finally to the Regional Administrator's Office for a determination of the reasonableness of that request.

b. Document Requests

The discussions in this area paralleled the discussions on verbal requests. The following additional areas were discussed:

- (1) If a request was made for documents not kept at the requested location, mutual agreement would be reached on the reasonableness to transfer the documents to the requested location or to inspect the documents in their normal storage location. This approach was mutually acceptable.
- (2) The guidance that documents not needed to demonstrate regulatory requirements will not generally be made available was dispositioned by establishing that the NRC reserved the right to determine what documents were necessary to demonstrate regulatory compliance and that such documents would be made available. Commonwealth Edison should appeal such determinations as in the case of verbal information requests if they believe the requests are unreasonable.
- (3) The guidance that the NRC may make copies of documents for their use provided that they agree to return the originals and destroy the copies was prompted by a Commonwealth Edison concern that documents which were not required to become part of the public record could inappropriately or unnecessarily become part of that record. Mr. Davis noted that similar guidance was provided to Region III personnel but that retention of certain documents may be required to sub-

stantiate an inspection finding. Mr. Knop noted that it would be acceptable for Commonwealth Edison to develop onsite reading rooms near NRC offices under the licensee's control where non-docketed materials could be made available for inspector use. Such rooms would reduce copying requirements. He also noted that it was standard Region III practice to request licensees to perform a proprietary review of a document prior to its release to a third party.

Mr. DelGeorge agreed to review the concept of reading rooms. He also agreed that the NRC practice of requesting proprietary reviews was an acceptable method for controlling release of documents to third parties.

c. Analysis Requests and Justification of Design Details, Operating Procedures, Etc.

Mr. Davis stated and Mr. DelGeorge agreed that the NRC had the authority to review any and all analyses that supported designs or operability determinations for safety-related systems, structures, or components. It was further agreed that NRC personnel would make reasonable requests for performance of additional analyses subject to the appeal process described above.

With respect to perceived differences between Region III and Office of Nuclear Reactor Regulation interpretations of requirements or acceptability of submittals, Mr. Davis stated that resolution was the responsibility of the NRC and that this resolution should be obtained before requesting additional analyses or justifications of a licensee.

d. Regular Meetings

Mr. DelGeorge stated that the NRC's desire to attend many routine meetings was legitimate and would be honored. He did state the NRC personnel would not be invited to attend meetings which dealt with matters such as personnel actions, planning, and finance which were not the legitimate interest of the NRC. Mr. Guldmond stated that should matters which are of concern to the NRC be discussed in such meetings, Commonwealth Edison should be prepared to discuss these matters with NRC representatives. Mr. DelGeorge accepted this position. Mr. Davis concurred in the Commonwealth Edison position.

In closing the meeting, both the NRC and Commonwealth Edison representatives agreed that all issues were satisfactorily resolved. Both parties agreed that their affected personnel would receive consistent briefings on the subjects discussed. Mr. DelGeorge stated the guidance as presented in the December 15, 1982 letter would not be formally issued.