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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

December 2, 1982

Docket No. 50-454  
Docket No. 50-455

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 Mr. A. B. Davis and other NRC representatives with Mr. Cordell Reed and other representatives of Commonwealth Edison Company on May 18, 1982 to review the results of the NRC's assessment of the utility's regulatory performance at the Byron Nuclear Station in accordance with NRC Manual Chapter 0516, "Systematic Assessment of Licensee Performance (SALP)," covering the period July 1, 1980 through December 31, 1981.

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

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 Byron Nuclear Station was satisfactory during the

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assessment period. I was pleased to note that significant progress was made in correcting the deficiencies in the electrical area. However, I concur with the SALP Board findings that there are specific areas that should be strengthened as noted in the SALP Report.

We have reviewed your letter of June 2, 1982, and Enclosure 1 which forward comments on the SALP Report. Relative to your desire for more definitive assessment standards, there is not much to add that has not already been discussed in our meetings concerning the present SALP process. 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 attributes of a licensee and that some of the guidance may be applied subjectively. The SALP process is not intended to be an accounting exercise against specific criteria, nor it is intended to be purely consultive to the extent to point 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 areas where we have identified concerns.

In responding to your request to clarify the Category 3 rating in Section IV.6, Electrical Power Supply and Distribution, we believe that the Conclusion and Board Recommendations adequately define our position. The Board acknowledged your efforts to correct identified weaknesses and recommended that your attention be directed towards ensuring the quality of work observed during the later part of the assessment period continue.

With respect to item number four under the April 1982 special team inspection discussed under Section IV.10, Quality Assurance, we acknowledge that the findings concerning inadequate procedures for tracking and correcting discrepancies were limited to only two contractors. However, within the context of the paragraph we do not believe that it was an unnecessary broad characterization of the deficiency.

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(s): SALP Report(s)  
No. 50-454/82-13 and No. 50-455/82-09

cc w/encl(s):  
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Davis  
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Keppler  
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