NOV 23 1982

Docket No. 50-373 Docket No. 50-374

Commonwealth Edison Company ATTN: Mr. Cordell Reed Vice Presiden* 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 you 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 LaSalle County Stations, Units 1 and 2 in accordance 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 including the SALP Board Chairman's letter to you and your written comments concerning the report 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 LaSalle County Station has improved throughout

this SALP period, and that more timely corrective actions early in the period in the functional area of Surveillance and Preoperational Testing would have raised the performance classification in this area. I shared the concerns identified by the Board in the area of Security and Safeguards and was pleased to receive your letter of August 27, 1982 describing the actions you are taking to alleviate these concerns.

We acknowledge your letter dated June 2, 1982 in which you transmitted comments on the LaSalle County Station 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. 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 consistant 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 is it 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.17, Surveillance and Preoperational Testing, we believe that the Conclusion and Board Recommendations adequately define our position. The Board realized that the preoperational testing phase was essentially complete on Unit 1 and that additional attention on Unit 1 was not warranted. In it's recommendation the Board stated that management attention should be directed toward ensuring that the same weaknesses and problems identified on Unit 1 were not perpetuated on Unit 2 and other CECo facilities.

We are pleased that Commonwealth Edison Company is committed to improving its performance; however, we feel that this may best be done through a program of self assessment. An obvious starting point would be the general guidance in NRC Manual Chapter 0516 since this guidance represents some of the basic attributes that, if addressed, should result in regulatory improvement.

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 James G. Keppler

James G. Keppler Regional Administrator

Enclosure(s): SALP Report(s)
No. 50-373/82-38 and
No. 50-374/82-08

cc w/encl(s):
Louis O. DelGeorge, Director
of Nuclear Licersing
D. L. Shamblin, Site
Construction Superintendent
T. E. Quaka, Quality
Assurance Superintendent
G. J. Diederich, Station
Superintendent
R. H. Holyoak, Project Manager
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