

October 27, 1998



U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Byron Station, Units 1 and 2  
Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. STN 50-454 and STN 50-455

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Zion Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-39 and DPR-48  
NRC Docket Nos. 50-295 and 50-304

Dresden Nuclear Power Station, Units 1, 2, and 3  
Facility Operating License Nos. DPR-2, DPR-19, and DPR-25  
NRC Docket Nos. 50-10, 50-237, and 50-249

Quad Cities Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Subject: Clarification to Proposed Revisions to the Commonwealth Edison  
Company Quality Assurance Program dated April 23, 1998

- References:
1. R. M. Krich letter to U. S. NRC, "Proposed Revisions to the Commonwealth Edison Company Quality Assurance Topical Report (QATR), CE-1-A, Pursuant to 10CFR50.54," dated April 23, 1998.
  2. R. M. Krich letter to U. S. NRC, "Clarification to Proposed Revisions to the Commonwealth Edison Quality Assurance Program dated April 23, 1998," dated August 21, 1998.
  3. D. M. Skay letter to O. D. Kingsley, "Review of Commonwealth Edison Company's Proposed Revision 66 to Quality Assurance Topical Report, CE-1-A, in Accordance with 10 CFR 50.54(a) Requirements," dated October 20, 1998.
- 1/  
2004

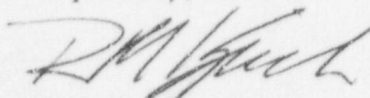
9811030180 981027  
PDR ADOCK 05000010  
W PDR

October 27, 1998  
U. S. Nuclear Regulatory Commission  
Page 2

Pursuant to 10 CFR 50.54(a)(3) and 10 CFR 50.4(b)(7), Commonwealth Edison (ComEd) Company submitted actual and proposed changes to its Quality Assurance Topical Report (QATR) CE-1-A, Revision 66, as described in Reference 1. Reference 2 modified the Reference 1 submittal and clarified certain of the proposed changes to the QATR. A telephone conference to discuss the Reference 2 submittal was held between representatives of ComEd and the NRC on October 13, 1998. As a result of this telephone conference and NRC review comments in Reference 3, the Reference 2 submittal is modified. These modifications describe the periodic effectiveness review process and audit frequency of Nuclear Safety Review Board activities.

To facilitate your review, the changed pages from the Reference 2 submittal providing the additional information are marked with revision bars and included as the attachments to this letter. Revised pages of QATR Section 18, "Audits," are also attached for your review.

Respectfully,



R. M. Krich  
Vice President - Regulatory Services

Attachments

cc: Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - Braidwood Station  
NRC Senior Resident Inspector - Byron Station  
NRC Senior Resident Inspector - Dresden Nuclear Power Station  
NRC Senior Resident Inspector - LaSalle County Station  
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station  
NRC Senior Resident Inspector - Zion Nuclear Power Station

Current Section 18, Article 3.1.2.e will be revised to be applicable to the Onsite and Offsite review functions for permanently shutdown plants, and PORC.

Present Commitment: Currently per Section 18, Article 3.1.2.e, audits of the Offsite and Onsite Review Functions are conducted on a planned and periodic frequency.

Reduction: As a result of changing the Offsite and Onsite review functions as described in this submittal, the audit frequency of NSRB will change from two to five years. In addition, NSRB activities will be reviewed at a frequency not to exceed 2 years to ensure compliance with the QATR requirements.

Justification: ANSI Standard N18.7-1976 Section 4.1 states in part "...programs for review and audits shall, themselves, be periodically reviewed for effectiveness by management of the owner organization." The membership of the NSRB includes senior level management, and full voting members from the Nuclear Oversight and Regulatory Services Organizations. The NSRB reports to and is accountable to the CNO, and also provides oversight of PORC activities. Participation at this level of management will ensure adequacy and effectiveness of the NSRB. Furthermore, the effectiveness of the NSRB functions will be demonstrated by the performance of the Sites as evidenced by Nuclear Oversight audits and assessments results, corrective action program and performance indicators. These oversight activities will provide alternative sources of performance information to alert senior management of weaknesses in NSRB reviews. Consequently, a longer period between audits with periodic reviews as noted above is warranted.

Audits of the Offsite and Onsite Review processes, at the permanently shutdown plants, and PORC will continue per revised Section 18.3.1.2.e.

#### **Bases for Compliance with 10CFR50, Appendix B**

Compliance with the 10CFR50, Appendix B, Criterion XVIII, audit requirements have not changed. Audits of NSRB activities will be performed every five years and a review of NSRB activities to ensure compliance with the QATR will be performed every 2 years. The combination of these activities will ensure NSRB effectiveness is adequately reviewed. Thus, compliance with 10CFR50, Appendix B, Criterion XVIII, remains unchanged.



*Onsite Review, Offsite Review and Commission approval of items involving unreviewed safety questions shall be obtained prior to station approval for implementation.*

With the transition to NSRBs and PORCs at operating plants, the Article will be revised to state,

*The PORC and the Nuclear Safety Review Boards shall review and recommend approval of items involving unreviewed safety questions prior to station approval for implementation. NRC approval shall also be obtained prior to station approval for implementation.*

- QATR Revision 65h, Section 17, Article 3.10.2 currently states, in part,

*Minutes of meetings and results of reviews performed by the Offsite and Onsite Review and Investigative Functions [shall be retained for the life of the plant].*

The Article will be revised to state,

*Minutes of meetings and results of reviews performed by the Nuclear Safety Review Board and the Plant Operations Review Committee [shall be retained for the life of the plant].*

- QATR Revision 65h, Section 18, Article 3.1.2 currently states, in part,

Internal audits shall be conducted on a performance driven frequency, not to exceed 24 months, and in accordance with the Company Quality Assurance Program and procedures. *Audits shall include the following safety-related functions:*

- e. *Onsite and offsite reviews.*

The Article will be revised to state,

Internal audits shall be conducted on a performance driven frequency, not to exceed 24 months or at a frequency indicated below, and in accordance with the Company Quality Assurance Program and procedures. *Audits shall include the following safety-related functions:*

- e. *Onsite Review and Offsite Review for permanently shut down units only, and PORC.*
  - f. *Perform an audit of NSRB activities at a frequency not to exceed 5 years.*

*Also, current items f through m will be relabeled.*

### 3.1.2 Scheduling

Planned and comprehensive performance based audits are performed to assure that safety related functions are fully evaluated.

Audits are performed to a schedule that includes the minimum audit areas and frequencies. They are approved by the Nuclear Oversight Manager or the Manager of Audits, or designated staff. Schedules are reviewed semi-annually and revised accordingly to assure that coverage is maintained current. Audits are initiated early to assure effective quality assurance during design, procurement, manufacturing, construction, installation, inspection, testing, and operations.

Additional unscheduled audits may also be performed at various stages of activities, based on the nature and safety significance of the work being done, to verify continued adherence to and effectiveness of the quality systems.

The Internal Audit Superintendent or the External Audit Superintendent, or designated staff, shall approve their respective agenda, checklist, findings, and report of each audit. Internal audits shall be conducted on a performance driven frequency, not to exceed 24 months or at a frequency indicated below, and in accordance with the Company Quality Assurance Program and procedures. Audits shall include the following safety-related functions:

- a. The conformance of unit operation to provisions contained within the technical specifications and applicable license conditions.
- b. The adherence to procedures, and training and qualification of the station staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, components, or method of operation that affect nuclear safety.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10CFR50.
- e. Onsite Review and Offsite Review for permanently shut down units only, and PORC.
- f. Perform an audit of NSRB activities at a frequency not to exceed 5 years.
- g. The facility fire protection programmatic controls including the implementing procedures by qualified Nuclear Oversight or station Quality and Safety Assessment personnel.

- h. The fire protection equipment and program implementation utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
- i. The Radiological Environmental Monitoring Program and its results.
- j. The Offsite Dose Calculation Manual and implementing procedures.
- k. The Process Control Program and implementing procedures for the solidification of radioactive wastes.
- l. The performance of activities required by the Company Quality Assurance Program for effluent and environmental monitoring.
- m. Changes to the Decommissioning Plan (Dresden Unit #1 only)
- n. Randomly selected procedures to ensure that the programmatic control processes, used to assure that procedures are technically and administratively correct prior to use, are resulting in timely and accurate procedure revisions.

Each ongoing ASME Code activity is audited annually and results are made available to the Authorized Inspection Agency.

Vendors and their subtier suppliers are audited periodically, generally in conjunction with plant visits for witnessing inspection points. The Company's active participation in joint utility audit programs provides an alternative means to fulfilling its responsibility for auditing active vendors.

### 3.1.3 Preparation

A documented plan or an agenda identifies the audit scope, requirements, audit personnel, activities to be audited, organizations to be notified, applicable documents, and schedule. An approved checklist or procedure for each audit identifies the quality and technical elements of the area or items to be evaluated. Audit plans, agendas, checklists, and procedures are prepared in advance under the direction of the Audit Team Leader.

### 3.1.4 Personnel

Audits are performed by experienced personnel qualified in accordance with NQA-1, Supplement 2S-3, 1989, who are familiar with written procedures, standards and processes applicable to the area being audited. Audit personnel shall have sufficient authority and organizational freedom to make the audit process meaningful and



Written administrative procedures shall be prepared and maintained for the NSRB. These procedures will include the following:

- 3.5.1 Preparation of meeting agenda, meeting minutes, and transmittal of information to the NSRB;
- 3.5.2 Use of committees and consultants;
- 3.5.3 Detailed listing of items to be reviewed;
- 3.5.4 Review and recommendation for approval or disapproval of items reviewed ; and
- 3.5.5 Method of appointing personnel, performing reviews and investigations, reporting findings and recommendations of reviews and investigations, self-assessment, approving reports, and distributing reports.

### **3.6 NSRB RECORDS**

Records documenting the actions of the NSRB will be produced and maintained as follows:

- 3.6.1 Minutes of each NSRB meeting shall be disseminated promptly to the President, NGG and Chief Nuclear Officer and to appropriate members of management having responsibility in the area reviewed; and
- 3.6.2 Copies of documentation, reports, and correspondence shall be kept on file at the appropriate station.

### **3.7 MEETING FREQUENCY**

- 3.7.1 Formal NSRB meetings shall be scheduled as needed but no less frequent than twice in a year.

### **3.8 NSRB Effectiveness**

- 3.8.1 An effectiveness review of NSRB activities will be conducted at a frequency not to exceed 2 years.
- 3.8.2 Nuclear Oversight will be responsible for conducting the review. The review will be performed by experienced Nuclear Oversight personnel and/or industry peers.
- 3.8.3 This review will include an evaluation of NSRB activities for compliance with the QATR requirements.

#### 4. REFERENCES

---

The following references were used in the generation of this Section.

- Facility Operating Licenses (Technical Specifications)
- Letter dated October 20, 1994 from G.F. Dick (NRC) to D.L. Farrar (ComEd)
- ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel"
- ANSI N18.7-1976 (ANS-3.2), "Quality Assurance for the Operational Phase of Nuclear Power Plants"