

Public

ComEd

PRIORITY ROUTING

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February 1, 1998

Mr. A. B. Beach, Regional Administrator
U.S. Nuclear Regulatory Commission-Region III
801 Warrenville Road
Lisle, Illinois 60532

Subject: Distribution of Rulemaking Information

Reference: January 9, 1998, Predecisional Enforcement Conference between the
Commonwealth Edison Company (ComEd) and the Nuclear
Regulatory Commission Regarding Quad Cities

Dear Mr. Beach:

At the Referenced Enforcement Conference, Mr. Mark Ring questioned the existing ComEd process for distributing rulemaking changes to regulations. I said I would reply to that question in writing.

ComEd has been following an informal process for the review, analysis, and distribution of rulemakings that has not required documentation of those activities. The corporate Licensing staff in this process was responsible for reviewing the Federal Register for proposed and final rulemakings, analyzing the possible effects of those rulemakings, and distributing information concerning the rulemakings to the site Regulatory Assurance organizations and the appropriate corporate subject matter experts. For final rulemakings, the appropriate corporate counterpart were given the responsibility of working with the sites to determine any necessary changes to site procedures and processes, and those changes were entered into the appropriate corrective action system and tracked to completion by the sites. When new editions of the Code of Federal Regulations were published, the sites and other corporate organizations received multiple copies to be used as references for their activities.

As a result of the issues raised in reviewing this process after discovery of the error at Quad Cities, ComEd has established a new process that requires documentation of the review and analysis of rulemaking.

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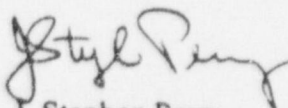


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The corporate Licensing organization will continue to review the Federal Register for NRC related rulemaking changes. They will analyze any changes and their possible effects on the established processes and procedures at our sites, and supply the results of that review to the Operating Experience (OPEX) Coordinator and Senior Site Management. That individual will transmit the rulemaking to the sites and to the appropriate subject matter experts using the recently established system-wide OPEX procedure. The OPEX process provides dissemination and analysis of information across a wide spectrum of employees, tracking of any corrective actions, and documentation of all actions. It is the process that we have established to ensure that lessons that we learn get fully transferred across the ComEd system. To ensure compliance, Corporate Licensing in conjunction with Q&SA will conduct an effectiveness audit as described in the ComEd Corrective Actions Program. Implementation of these actions will ensure that the ComEd sites are fully aware of changes to existing regulations.

Sincerely,



J. Stephen Perry
BWR Vice President

cc: Mark Ring, Chief Reactor Project Branch 1-Region III