



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

September 4, 2002

Mr. John L. Skolds, President
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Skolds:

Reference: 1) Letter from B. Clayton (NRC) to J. Skolds (Exelon), dated May 1, 2002
2) Letter from P. Simpson (Exelon) to B. Clayton (NRC) dated July 12, 2002

On May 1, 2002 the U.S. Nuclear Regulatory Commission (NRC) provided you with information we received concerning activities at Exelon facilities. We requested that you evaluate the information and provide the results of this evaluation to the NRC. You responded on July 12, 2002. Our technical staff has reviewed your response and determined that additional clarifying information is necessary to resolve the issues. The need for this information was discussed with Donald Cecchetti and other members of your staff during several telephone conversations in early August. The enclosed information documents our understanding of those conversations as well as requesting specific additional information.

The responses to Details 1 and 5 were considered to be satisfactory, and no further information is needed on these two items. For Details 2 and 3, NRC is primarily seeking confirmation of the information provided verbally. However, for Details 4 and 6, we determined that additional review by your staff was necessary. We have included specific questions asked during the telephone conversations; we consider responses to these questions necessary to complete evaluation of the issues. In your response, you should provide specific reference to the procedures, drawings or analyses supporting your conclusions. In addition, we are forwarding one new issue (Detail 7) for your review.

We request that this additional information be submitted to Region III within 30 days of the date of this letter. Your response to this request should not be docketed and should be sent in an envelope addressed to the Region III Enforcement and Investigations Officer. We also request that your response contain no personal privacy, proprietary, or safeguards information. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response you seek to have withheld and provide in detail the bases for your claim of withholding (i.e., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information.) If safeguards

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information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

The enclosure to this letter should be controlled and distribution should be limited to personnel with a "need to know" until your evaluation has been completed and reviewed by NRC, Region III. The enclosure to this letter is considered "NOT FOR PUBLIC DISCLOSURE." We appreciate your cooperation and will gladly discuss any questions you may have concerning this information. Should you have questions, please contact either one of the NRC Region III Allegation Coordinators (Jim Heller or Andrea Kock) or the technical reviewer, Patricia Loughheed. The Region III switchboard may be reached at (630) 829-9500.

Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia D. Pederson", with a long horizontal flourish extending to the right.

Cynthia D. Pederson, Director
Division of Reactor Safety

Enclosure: Details
~~NOT FOR PUBLIC DISCLOSURE~~

J. Skolds

-2-

information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

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Sincerely,

/ RA /

Cynthia D. Pederson, Director
Division of Reactor Safety

Enclosure: Details
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(No other distribution)

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Please reference file [REDACTED] in your response.

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Detail 2:

Initial Request: In Reference 1, NRC requested that Exelon identify any work products obtained during the 1997 stop work order against General Electric, Nuclear Engineering (GE-NE).

Initial Response: In its response (Reference 2), Exelon stated that "the procurement process did not allow for procurement of materials or services from a vendor with a stop work order that was specific to a particular task without direct involvement in the process which would ensure adherence to the ComEd procedures and processes."

Additional Response: During a subsequent telephone conversation on August 7, 2002, between D. Cecchetti, et. al. (Exelon), and P. Loughheed (NRC), Exelon employees stated that "No architectural engineering services, no calculational services and no design activities on safety-related work were procured from GE-NE during the time period the stop work order was in effect." Additionally, Exelon employees elaborated that the type of work performed during the outages was only maintenance activities that would not be covered by the stop work order.

Request for Additional Information:

- 1) Please confirm the verbal information provided.
- 2) Please document what work, if any, GE-NE performed on previously let contracts during the time period that the stop work order was in effect and how this work was controlled.

Detail 3:

Initial Request: In Reference 1, NRC requested that Exelon identify whether monthly updates were issues as required and provide the basis for your determination.

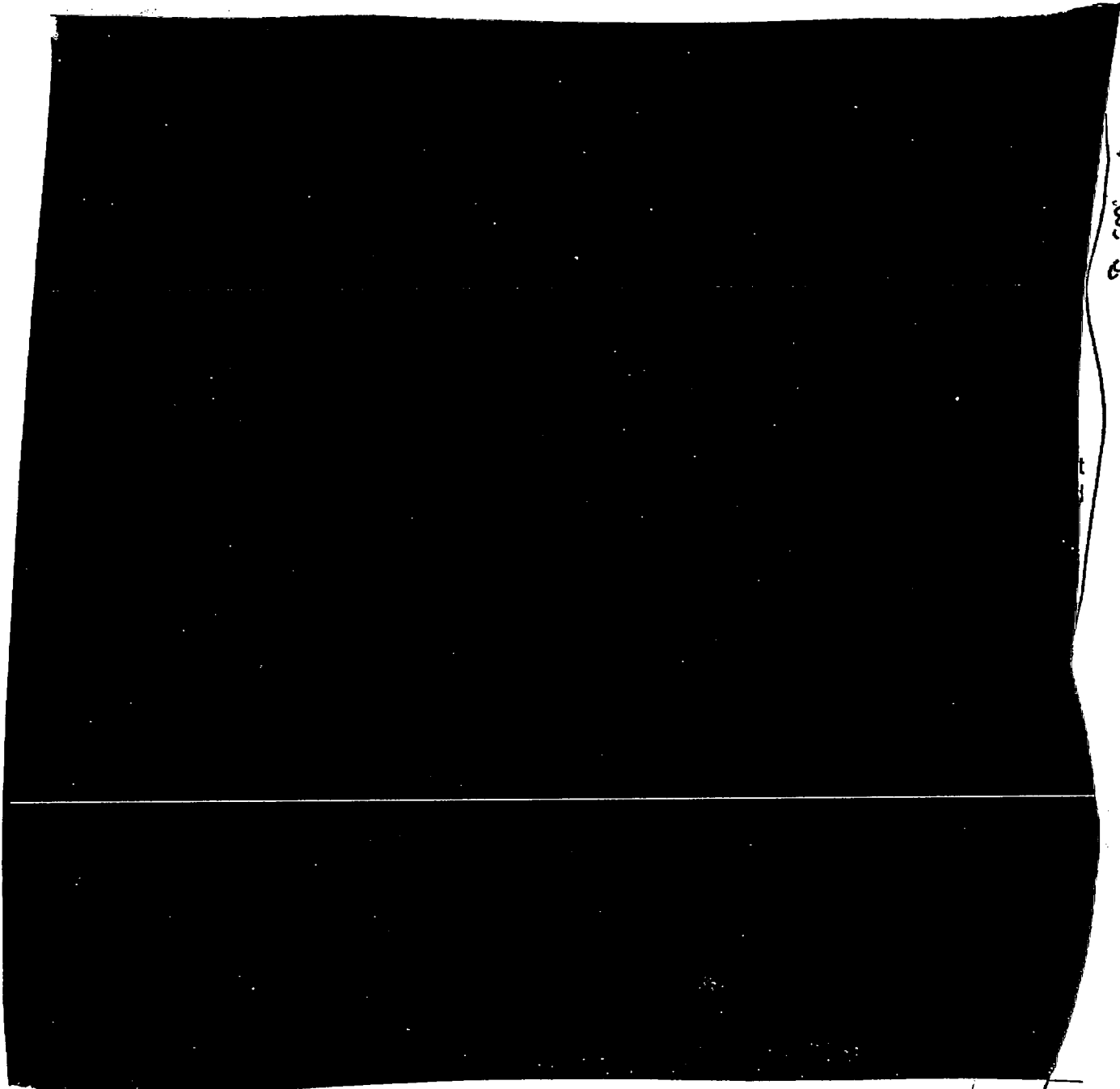
Initial Response: In its response (Reference 2), Exelon stated that, "based on a review of quality assurance requirements in place at the time, the quality assurance program did not require vendors or other auditees to provide monthly updates for corrective actions." The licensee further stated that no monthly updates were supplied.

Additional Response: In followup telephone conversations on August 7 and August 14, 2002, between D. Cecchetti, et. al. (Exelon), and P. Loughheed (NRC), Exelon employees stated that monthly status reports were provided by GE-NE from December 1997 until April 1998, in accordance with commitment 3 of the letter lifting the stop work order. During the August 14, 2002, telephone call, the licensee stated that GE-NE had documented that all corrective

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actions were considered to be completed in a May 1998 letter, at which time Exelon/ComEd scheduled the followup audit.

Request for Additional Information: Please confirm the verbal information provided.



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