



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

June 19, 1981

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Quad Cities Station Units 1 and 2
LaSalle Station Units 1 and 2
Response to NRC Inspection Report
Nos. 50-254/81-07, 50-265/81-07,
50-373/81-16
NRC Docket Nos. 50-254/265 and 50-373

Reference (1): C. E. Norelius letter to C. Reed dated
May 26, 1981

Dear Mr. Keppler:

The following is in response to the inspection conducted by Messrs. R. D. Schultz and M. M. Holzmer of your office conducted on April 20-21, 1981 of activities at the Commonwealth Edison Company corporate offices. Reference (1) indicated that certain activities appeared to be in non-compliance with NRC requirements. The Commonwealth Edison response is provided in the enclosure.

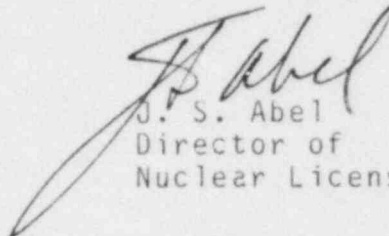
To the best to my knowledge and belief the statements contained herein (and/or in the attachment) are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

B111130641 B11109
PDR ADOCK 05000254
Q PDR

JUN 24 1981

Please refer any additional questions you may have in this regard to this office.

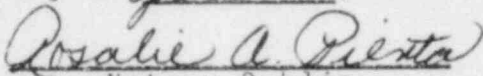
Very truly yours,


J. S. Abel
Director of
Nuclear Licensing

Enclosure

cc: RIII Resident Inspector - Quad Cities
RIII Resident Inspector - LaSalle

SUBSCRIBED and SWORN to
before me this 19th
day of June, 1981


Rosalie A. Pienta
Notary Public

2199N

Enclosure

Response to Notice of Violation

The item of apparent non-compliance identified in Appendix A of the NRC letter dated May 26, 1981 is responded to in the following paragraphs.

1. 10 CFR 50, Appendix B, Criteria IV, states, "Measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably referenced in the documents for procurement of material, equipment and services, whether purchased by the applicant or by its contractors or subcontractors. To the extent necessary, procurement documents shall require contractors or subcontractors to provide a quality assurance program consistent with the pertinent provisions of this appendix."

Commonwealth Edison Company's Quality Assurance Program Topical Report, CE-1-A, Revision 14 and 15, Section 4 - Procurement Document Control states in part concerning procurement documents, "Quality Assurance Program requirements are included as a regulatory, code, standard and design requirements."

Contrary to the above, instances were identified where procurement documents failed to impose the quality assurance program requirements of 10 CFR 50, Appendix B or the applicable requirements of 10 CFR 21. The specific purchase orders are identified in Paragraph 2 of the enclosed inspection report.

Corrective Action Taken and Results Achieved

Part (1): In arriving at this noncompliance, the NRC inspector selected five safety-related Purchase Orders from the Quad Cities Station. These purchase orders are for like-for-like replacement parts from the original equipment manufacturers for original plant equipment as provided in CECO. Topical Report CE-1-A. The purchase orders were marked safety-related and did not impose the provisions of 10 CFR 50 Appendix B.

Per the CECO. Topical Report, Section 4, CECO. when purchasing spare or replacement parts, must ... "assure quality equivalent to the original equipment"...and..."The procurement of spare parts or replacement items will be subject to controls at least equivalent to those used for the original equipment." For Quad Cities, Zion and Dresden Stations, the original plant equipment generally was not specifically manufactured to the requirements of 10 CFR 50 Appendix B because the procurements were made prior to the effective date of Appendix B. Therefore, in order to obtain replacement and spare parts with quality equivalent to the original equipment, the purchase orders for these items were placed with

the original equipment manufacturers and the manufacturers were required to provide documented certification that the procured items were equal in quality to the original purchase. For these stations CECO. is in compliance with it's approved Topical Report.

The NRC inspector also selected two safety-related purchase orders for the LaSalle County Station. Since original procurements for LaSalle County Station were made after 10 CFR 50 Appendix B became effective, it is required that safety-related replacement parts be purchased to the original specification requirements which included provisions for 10 CFR 50 Appendix B. CECO. will review its procedures for purchasing spare and replacement parts for LaSalle, Byron and Braidwood stations to assure that these procedures provide for imposing the applicable 10 CFR 50 Appendix B criteria as was done in the original purchase.

(Part 2): CECO. agrees that the purchase orders identified in this noncompliance should have imposed 10 CFR Part 21 as these items, although commercial grade items, are unique to licensed facilities. Effective 5/15/81, QP 4-1 and QP 4-51 were revised to clarify that 10 CFR 21 must be imposed on purchases of safety-related items that have unique nuclear application.

Corrective Action to Prevent Recurrence

See Corrective Action Above.

Date of Full Compliance

Corrective action will be completed by 8-1-81 for action under both parts 1 and 2.

2199N