



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

November 24, 1982

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

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Response to IE Inspection Report
Nos. 50-237/82-21, 50-249/82-22,
50-254/82-17, and 50-237/82-19
NRC Docket Nos. 50-237, 50-249,
50-254, and 50-265

- References (a): W. S. Little letter to Cordell Reed
dated October 26, 1982.
- (b): C. E. Norelius letter to Cordell Reed
dated July 1, 1982.
- (c): L. DelGeorge letter to J. G. Keppler
dated July 30, 1982.

Dear Mr. Keppler:

Reference (a) provided results of the special inspection conducted by Messrs. D. H. Danielson and I. T. Yin of your office on August 25, 1982, at NUTECH Engineers, San Jose, California, and on August 26-27, 1982 at EDS Nuclear Inc., Walnut Creek, California, of activities concerning Dresden Station Units 2 and 3 and Quad Cities Station Units 1 and 2. The Commonwealth Edison Company response to the item of noncompliance identified in Reference (a) is provided in Attachment 1. Provided in Attachment 2 is a copy of the approved NUTECH/EDS design interface procedures as requested.

In Inspection Report Nos. 50-237/82-08, 50-249/82-09, 50-254/82-09, and 50-265/82-10 (Reference (b)), Commonwealth Edison received an item of noncompliance which was virtually identical to the noncompliance identified in Reference (a). We were cited as having a deficient Q.A./design audit program to ensure contractor Q.A. program implementation because we had not performed any implementation Q.A. audits or surveillances from CY 1980 to CY 1982 at EDS Nuclear, Inc. In our Reference (c) response, we described the measures we have taken to ensure that annual audits will be made of all architect-engineering firms actively performing safety-related work.

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J. G. Keppler

- 2 -

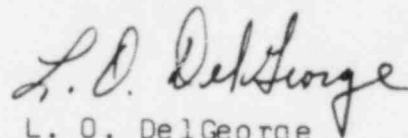
November 24, 1982

Because this previous inspection report and our response directly and adequately addressed this issue, it is our belief that the current non-compliance is not warranted, and should be withdrawn.

To the best of my knowledge and belief the statements contained herein and 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 and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address questions you may have concerning this matter to this office.

Very truly yours,



L. O. DelGeorge
Director of Nuclear Licensing

TJR/lm

cc: Region III Inspector - Dresden
Region III Inspector - Quad Cities

Attachment

5482N

ATTACHMENT

Commonwealth Edison Company

Response to NRC Notice of Violation

10 CFR 50, Appendix B, Criterion XVIII, states, in part, that "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Station," Revision 20, dated February 17, 1982, states in Section 18 that, "Audits will be performed by Commonwealth Edison Company and/or its contractors, subcontractors and vendors to verify the implementation and effectiveness of quality programs under their cognizance."

Commonwealth Edison Company Q.A. Manual, Quality Procedure No. 18-1, "Quality Program Audits," Revision 8, dated July 10, 1981, states in Section 5.2 that, "The selection of off-site facilities to be audited and the frequency of audits will be based on Contractor Capability Evaluation, CECO Construction Surveillance Reports or findings from previous audit reports. Audits may be performed on off-site contractors that are selected on an irregular basis without regard to previous Capability Evaluation or audit reports. The frequency will be based on the nature and safety significance of the work being performed. Generally, audits will be scheduled where practical to coincide with plant visits involving witnessing inspection notification points. Audits of the Nuclear Steam Supply vendor, the Architect-Engineer and Station Nuclear Engineering Department will be conducted in approximate annual basis."

Contrary to the above, the Q.A./design audit program to ensure contractor program implementation was deficient, in that: (1) there had been no implementation Q.A. audits or surveillances conducted from CY 1977 to CY 1979 at NUTECH; and (2) deficiencies existed in the NUTECH Q.A. audit program that had gone undetected.

Discussion

Commonwealth Edison Company has an extensive program for auditing off-site vendors and architect-engineers. During the years, 1979, 1980, and 1981, audits have been conducted at 68, 74, and 105 off-site facilities, respectively. For 1982 the Off-Site Vendor Audit Schedule, which was issued on January 20, 1982, required that audits be performed at 90 off-site locations. In addition, the General Office Quality Assurance Department Audit Schedule dated December 15, 1981 included five audits of NSSS Vendors or A/Es for 1982 bringing the total original commitment for audits of off-site facilities to 95 for 1982.

Corrective Action Taken and Results Achieved

In reference to NUTECH, Inc., San Jose, California, Commonwealth Edison acknowledges that a Q.A. audit of these activities was not conducted during the period 1977-1979. However, as described in the above inspection report, Commonwealth Edison Quality Assurance Department conducted audits of NUTECH, San Jose, California offices on August 19-20, 1980 and July 14-15, 1982. The CECOs audits included a review of the NUTECH internal Q.A. audit program. In the 1980 audit, one deficiency was identified and in the 1982 audit, two deficiencies were identified. These deficiencies were adequately resolved and subsequently closed on September 30, 1980 and August 26, 1982, respectively. Corrective Action for this non-compliance is complete.

Action to Prevent Recurrence

In the preparation of off-site vendor audit schedules, special care will be made to require annual audits of all active architect-engineer firms performing safety-related work. In addition, on June 8, 1982 a review of the 1982 off-site vendor audit schedule was completed to assure that appropriate vendors are being audited during the current program. This action to prevent recurrence is identical to that previously provided in Reference (c).

Date of Full Compliance

Full compliance has been achieved.