



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

February 18, 1993

U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn. Document Control Desk

Subject: Zion Nuclear Power Station Units 1 and 2
Response to NRC's Systematic Assessment of Licensee
Performance (SALP) Report 50-295/93001; 50-304/93001
NRC Docket Numbers 50-295 and 50-304

Reference: A. B. Davis letter to L.O. DelGeorge dated February 1,
1993 transmitting Zion Station Initial SALP 11 Report

Gentlemen:

Commonwealth Edison Company (CECo) would like to thank you for meeting with us and presenting the SALP 11 Report on February 17, 1993, as well as affording us the opportunity to provide our views on the SALP results. This letter provides CECo's comments to the Report as discussed during the meeting.

CECo appreciates the NRC's recognition of the improved overall performance of Zion Station. We are pleased with the NRC's evaluation of Zion's performance in both the Security and Emergency Preparedness functional areas as Category 1. In particular we are pleased with the recognition of our staffs' contribution to successful performance. We fully expect that these two areas will continue to improve during the coming SALP cycle.

In the remaining functional areas, all of which were rated as Category 2, Zion management continues to direct attention to those challenges and opportunities for improvement which are discussed in the Report.

With regard to Plant Operations, we are pleased with the recognition of improvement in communications, morale, and work quality, and we fully expect continued improvement in these areas in the future. With regard to personnel errors, significant reduction of personnel error rates has been identified as one of the top three priorities for 1993. Initiatives aimed at continued reduction of personnel error rates have already been implemented and are producing positive results. Additional initiatives are in the process of implementation. Included among these are expansion of the Station's Integrated Quality Effort (IQE) Committee and weekly trending and analysis of data provided by Zion's Integrated Reporting Program (IRP).

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As indicated in the Report, Radiological Controls at Zion have seen broad scope changes with resulting improvements. The benefits of these changes have been clearly realized during the current Unit 2 refueling outage. We are gratified by the recognition of our staffs' effectiveness, and are confident that continued improvements will be realized throughout the SALP 12 period.

CECo appreciates the NRC's recognition of significant improvement in the Maintenance/Surveillance area, in particular, those noted areas of planning and scheduling, preventive maintenance, and reduction in corrective maintenance backlog. Zion management is aware of the importance of an effective Foreign Material Exclusion (FME) program and accordingly has developed a comprehensive Management Action Plan (MAP) to direct station FME improvement efforts. In addition, senior management field monitoring activities now include FME program compliance as a top priority. Similarly, MAPs have been developed to address the issues of leak reduction and re-work tracking. The upcoming dual unit outage, scheduled to commence in the Fall of 1993, has been scoped to address the most significant contributors to excessive leaks in plant systems.

With regard to the area of Engineering/Technical Support, we are pleased with the recognition noted in improvement of Technical Staff and Site Engineering involvement in plant activities. In the area of temporary alterations (T/A), an aggressive plan is underway aimed at reducing the number of T/A's installed in the plant. These actions include quarterly walkdowns by cognizant system engineers, development of a detailed MAP for each T/A installed for greater than six months, and regularly scheduled reviews and audits of safety evaluations for T/A's. Post-maintenance/post-modification testing (PMT) initiatives include establishment of a PMT committee to identify enhancements to PMT procedures and documentation. Additionally, the station has established a goal of having all modification test procedures written and approved two months prior to the start of the outage in which the modification will be installed.

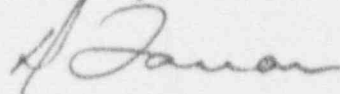
Initial License Training (ILT) improvement plans for 1993 include restructuring the program sequence to reduce the time between certification and the NRC examination, additional formalization of the candidate self-study review process, and improved exam review documentation.

To further the broad improvements identified in the Safety Assessment/Quality Verification area, Zion recently began implementing an improved technical review and control process. This process is designed to optimize the quality of technical reviews while at the same time allowing the On-Site Review committee to focus on those items that have a greater potential for affecting nuclear safety. Initiatives to ensure continuous improvement in the overall quality of licensing submittals include the formation of a site licensing group within the Regulatory Assurance department at Zion. The immediate goal of this organizational change will be to provide for a better and more consistent quality technical submittal.

In closing, CECo appreciates the efforts of the Nuclear Regulatory Commission in preparing and presenting the SALP Report. Zion Station believes that increased ownership and personal accountability, continual self assessment, and effective corrective actions are keys to realizing continuous improvement. The recent organizational changes in CECo's nuclear division are designed to optimize utilization of resources and support of the continuous improvement process. With these facts in mind, CECo and Zion Station look forward to even more significant improvements during the SALP 12 cycle.

Please direct any questions you may have to this office.

Sincerely,

A handwritten signature in dark ink, appearing to read "D.L. Farrar", written in a cursive style.

D.L. Farrar
Nuclear Regulatory Services Manager

cc: A. B. Davis, Regional Administrator-RIII
J. D. Smith, Senior Resident Inspector-Zion
C. Shiraki, Project Manager-NRR

ZNLD/2511/4