



January 30, 1997

Mr. A. Bill Beach
Regional Administrator
U. S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Subject: ComEd Plan for Upgrading the Quality and Access to Design
Information at all Six Nuclear Stations

Reference: November 12, 1996, letter from T. J. Maiman to A. B. Beach

Dear Mr. Beach:

In the referenced letter, I outlined a series of proactive short term corrective actions ComEd is implementing voluntarily at all six nuclear stations to improve the quality, maintenance and accessibility of design information. I also noted that I had directed the Engineering Vice President to develop a more comprehensive plan by December 31, 1996, that would include long term actions. The purpose of this letter is to provide the NRC staff with a summary of that plan including scope, schedule, and estimated financial commitment. Additionally, we would like to request a meeting in late February to discuss this plan and its relationship to our forthcoming responses to the NRC's October 9, 1996, 10CFR50.54(f) letter concerning design basis information. At the meeting, we would also like to describe other actions that are underway that will strengthen the role of ComEd's engineering organization as the design basis authority at all six sites.

A brief background and a summary of the planned actions is provided below. The actions address three broad categories of design information: Design Basis Document Manuals, Critical Calculation Information, and UFSAR Validation.

Design Basis Document (DBD) Manuals

During the period of 1991 to 1996, a DBD program was implemented at ComEd. Twenty to twenty-five DBD manuals were developed for each of the Dresden, Zion and Quad Cities stations. Creation of manuals for LaSalle Station began in late 1995 and three manuals have been issued to date. (It was determined that Byron and Braidwood Station FSAR's provided sufficient information regarding the design basis to preclude the need for system DBD manuals.) ComEd performed validations of

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selected DBD manuals for several sites, however, a comprehensive validation program was not implemented. The need to validate existing DBD manuals has been identified as a program weakness.

ComEd plans to expand the scope and coverage of the DBD program beyond that of the existing DBD manuals. Depending on the particular site, this may include system manuals, topical manuals, or a combination of both. All approved DBD manuals, existing and planned, will be validated for adequacy, correctness, and consistency with the UFSAR, other applicable design documents, and plant procedures. For Byron and Braidwood, specific tools ("roadmaps") will be developed to assist engineers in navigating through the various sources of available design information. These road maps will be developed in lieu of system DBD manuals. In a limited number of selected areas, topical DBD manuals will be developed to promote understanding of the existing information in the UFSAR and other sources.

Critical Calculational Information

In the past, ComEd utilized Architect Engineering (A/E) firms to maintain and control design basis calculations. Until now, ComEd did not have a plan to systematically recreate or develop certain calculations not already performed as part of the original design process. For the three older sites, Dresden, Quad Cities and Zion, many calculations considered necessary by today's standards to demonstrate fulfillment of design bases functions do not exist. Corporate guidance was not always clear as to what calculations are critical and should be developed and/or maintained current.

As part of the DBD and "in house" design initiatives, ComEd more recently has taken custody of a significant portion of the calculations developed in support of the original design and subsequent modification efforts. To improve the quality of calculations necessary to support the design bases of our plants, several related activities will be performed as follows.

- A corporate Nuclear Engineering Procedure, NEP, will be developed which will define and provide guidance on instances where critical calculations are required. Utilizing this procedure, a review of selected existing key design bases calculations will be performed. Calculations supporting critical design bases parameters, will be validated to ensure accuracy and completeness. If it is determined that calculations do not exist or are inadequate to support essential design bases requirements, a needs evaluation will be performed. Those calculations determined to be significant will be revised or reconstituted as appropriate.
- An additional NEP will be generated to provide clear corporate guidance and enhanced expectations regarding configuration management requirements for critical calculations and parameters.

UFSAR Validation

The format and level of detail contained in the UFSARs at ComEd's nuclear stations varies with the age of the plant. Recently, ComEd performed a review for all stations to determine actions necessary to improve, on an ongoing basis, conformance with UFSARs and the processes to ensure that conformance. We concluded that improvements were necessary in both the present state of conformance and the processes for ensuring future conformance.

To ensure the integrity of the UFSAR, a verification and validation of the regulatory design basis information (10CFR50.2) contained in the UFSAR will be performed at each site. This will include a review of the UFSAR, Technical Specifications, other applicable design documents, and plant procedures. These review efforts will help to ensure that UFSARs accurately describe the design and operation of the plants. Certain parameters contained in the UFSAR, which are key to understanding the design bases of the plant, will be identified. Supporting documentation for these parameters will be evaluated and enhanced where appropriate as part of the critical calculation reviews described above.

Summary

The following matrix summarizes the above described activities planned for each site. All work is currently scheduled to be completed by May, 1999, while priority is being placed upon UFSAR validation.

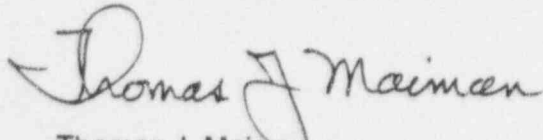
Site	Calculational Information Validation and Reconstitution	DBD Manual Development ----- Existing	DBD Manual Development ----- Additional Planned	DBD Validation	UFSAR Validation
Braidwood	Yes	0	5 Topical	Yes	Yes
Byron	Yes	0	5 Topical	Yes	Yes
Dresden	Yes	20 System, 3 Topical	3 System, 7 Topical	Yes	Yes
LaSalle	Yes	3 Topical	20 System, 7 Topical	Yes	Yes
Quad Cities	Yes	19 System, 3 Topical	3 System, 7 Topical	Yes	Yes
Zion	Yes	24 System, 3 Topical	7 Topical	Yes	Yes

Additional planning associated with these activities is ongoing. As a result, some plan specifics may vary slightly as we proceed with the project. For example, the specific numbers of additional DBDs, the balance between System and Topical Manuals, and the format (hardcopy or electronic) of DBDs produced, may be adjusted based upon individual station needs.

To properly manage the various activities, a detailed project plan is being developed with specific implementing instructions. While we recognize that this project requires a substantial financial commitment, we view this effort as essential to safe and competitive electricity production.

We look forward to discussing these issues with you in February and will be contacting your office to arrange a time that is mutually convenient.

Sincerely,

A handwritten signature in cursive script that reads "Thomas J. Maiman". The signature is fluid and elegant, with the first letters of the first and last names being capitalized and prominent.

Thomas J. Maiman
Executive Vice President