

March 31, 2000

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: PLANT PERFORMANCE REVIEW - DRESDEN

Dear Mr. Kingsley:

The purpose of this letter is to communicate our assessment of your performance and to inform you of our planned inspections at your facility. On March 6, 2000, we completed a Plant Performance Review (PPR) of the Dresden Nuclear Power Station. We conduct these reviews to develop an integrated overview of the safety performance of each operating nuclear power plant. We use the results of the PPR in planning and allocating inspection resources and as inputs to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from February 1, 1999 through January 31, 2000, but emphasized the last six months to ensure that our assessment reflected your current performance. Our most recent summary of plant performance was provided to you in a letter dated March 26, 1999, and was discussed with you in a public meeting on June 15, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We plan to begin initial implementation of the revised reactor oversight process industry-wide, including your facility, on April 2, 2000.

This PPR reflects continued process improvements as we make the transition into the revised reactor oversight process. You will notice that the following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we are organizing the results into the strategic performance areas embodied in the revised reactor oversight process. In addition, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with the inspection results in assessing your performance. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not

reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

During the last six months, Dresden Unit 2 completed a record run of 418 days on October 1, 1999, the start of Unit 2 refueling outage D2R16. This refueling outage was also completed in a ComEd record time of 26 days. Though improvements were noted in plant material condition, equipment problems, such as air leaks on a feedwater regulating valve, oil leaks on both reactor recirculation pumps, and electrohydraulic control problems, continuously challenged operators. Single-loop operation and multiple load drops were performed to address plant material condition problems, such as foreign material in two condensate/condensate booster pumps. During the last six months, Dresden Unit 3 operated at full power for most of the period, except for an automatic scram on December 11, 1999, during main turbine logic testing.

We have not identified any significant performance issues in the Reactor Safety, Radiation Safety, and Security strategic areas during this assessment period and note that Dresden continues to operate in a safe manner. Therefore, we plan to conduct only baseline inspections at your facility as noted in the attached inspection plan.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that was used during this PPR process to arrive at our integrated view of your performance trends. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The attached PIM includes items summarized from inspection reports or other docketed correspondence between the NRC and ComEd regarding the Dresden Nuclear Power Plant. We did not document all aspects of your programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the attached PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2000 through March 2001 to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival on site. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future due to emerging performance issues at Dresden or other Region III facilities. Routine resident inspections are not listed due to their ongoing and continuous nature.

O. Kingsley

-3-

We will inform you of any changes to the inspection plan. If you have any questions, please contact me at 630/829-9703.

Sincerely,

/RA/

Mark Ring, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosures: 1. Plant Issues Matrix
2. Inspection Plan

See Attached Distribution

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-3-

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