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10 CFR 50.4

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Response to Substantive Cross-Cutting Issue Concerning Human Performance

- References:
1. NRC Mid-Cycle Assessment Letter – LaSalle Nuclear Power Station, dated August 30, 2004
 2. NRC Annual Assessment Letter – LaSalle Nuclear Power Station, dated March 2, 2005
 3. LaSalle County Station Response to Substantive Cross-Cutting Issue Concerning Human Performance, dated April 29, 2005
 4. NRC Mid-Cycle Assessment Letter – LaSalle Nuclear Power Station, dated August 30, 2005.

In Reference 1, the NRC noted a substantive cross-cutting issue in the area of human performance. In Reference 2 this continued to be a concern during the end-of-cycle assessment letter. Reference 4 did note a reduction in the frequency and significance of human performance errors over a three month period, however, based on the 2005 Unit 2 outage human performance, additional satisfactory refuel outage performance is needed to ensure sustained improvement. This issue is based on several inspection findings in which human performance was less than adequate.

Exelon Generation Company, (EGC) LLC, is aware and acknowledges that instances of inadequate human performance (HU) have occurred at LaSalle County Station (LSCS). As discussed in Reference 3, several long-term corrective actions have been initiated to resolve this concern. A comprehensive Human Performance Excellence Plan (HPEP) is in place that focuses on basic fundamentals of human performance and establishes the framework for continuous improvement. The HPEP is a dynamic tool that is updated with actions from applicable Corrective Action Program (CAP) products such as root cause investigations (RCI), apparent cause evaluations (ACE) and common cause analyses (CCA) related to human performance issues. In addition to the actions identified in Reference 3, additional CCAs associated with human performance were conducted and these CCAs validated that the HPEP continues to be properly focused in the following four strategic areas: Planning, Execution, Processes and Results. These four strategic areas and their attributes are discussed in Reference 3.

As acknowledged in Reference 4, there has been a reduction in the frequency and significance of human performance errors during normal power operations over the last three months. The current results of the actions associated with the HPEP appear in the tables below.

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Event Clock Reset Data

Department	2003	2004	2005 (YTD)
Station	5	3	1
Operations	9	6	4
Maintenance	12	5	4
Engineering	6	4	1
Radiation Protection	19	8	2
Chemistry	4	2	3

L1R10 vs. L2R10 Event Clock Reset Data

Department	L1R10	L2R10
Station	2	0
Operations	2	1
Maintenance	2	0
Engineering	1	0
Radiation Protection	2	0
Chemistry	1	1

Also noted in Reference 4, based on the Unit 2 outage (L2R10) human performance, sustained improvement is inconclusive. It is recognized that continued reinforcement of standards and expectations with respect to compliance with procedures (i.e., written instructions) and supervisory oversight are necessary. The HPEP was heavily focused on radiation (Rad) worker practices and the corrective actions taken in response to this issue were successful as shown below.

Refuel Outage Rad Worker Practices

	2004	2005 (YTD)
High Rad Events	4 (3 in L1R10)	1 in L2R10
Personnel Contamination Events	467 in L1R10	108 in L2R10
RAM Events	2 in L1R10	0 in L2R10
Rad Worker Adherence Rate (Events/10,000 RWP hours)	~ 0.90 in L1R10	~ 0.68 in L2R10

Specific actions taken in L2R10 were provided in Reference 3.

- During non-outage periods, communication of Human Performance is continuous and reinforced through the reports from the Departments on the department and crew clock resets. In addition, a six-month trend summary is performed focusing on department and crew clock resets. Specific fundamentals that are in variance are addressed during the morning "Plan of the Day" meeting. These trend summaries are then included in the weekly communications package to be reviewed at formal departmental communication meetings.
- Implementation of the new CAP process in combination with line ownership, self-assessment and collegial reviews of Issue Reports (IRs) has resulted in an increased rate of identification of issues by the line organization and improved coding to identify HU issues.

The table below illustrates a noticeable increase in identification of issues at a precursor level. The actions taken by the departments in addressing these issues has resulted in a reduction in the percentage of Significance Level 3 HU IRs.

Refuel Outage Human Performance Related IRs

	L1R10 (2004)	L2R10 (2005)	Percent Change
Total IRs Level 2 – 4	408	1128	+ 276
Level 2 – 4 HU IRs	105	451	+ 429
Percent Level 3 HU IRs	12.4	6.0	- 6.4

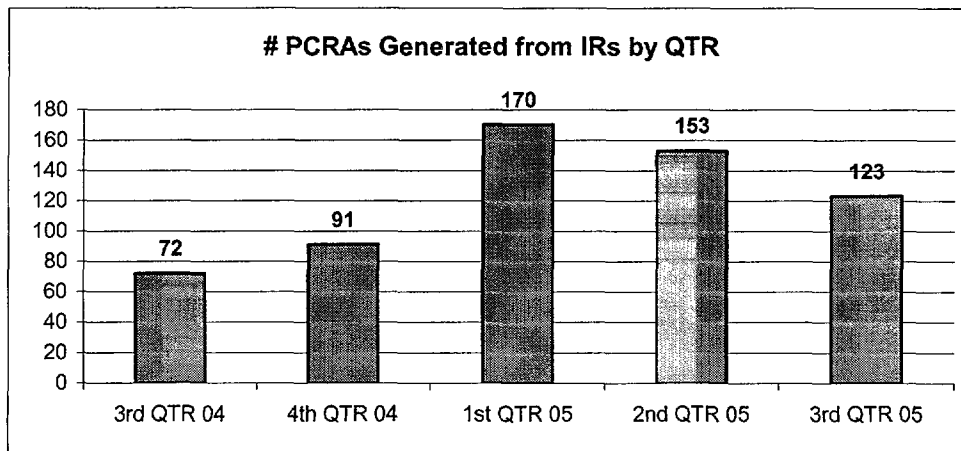
- Implementation of HU-AA-1212, Technical Task Risk/Rigor Assessment, Pre-Job Brief, Independent Third Party Review, and Post Job Brief, and HU-AA-102, Technical Human Performance Practices, has resulted in the following:
 - A significant improvement in Engineering human performance based on the strict enforcement of these procedures by Engineering Management.

Outage Engineering HU Performance*

	1st Qtr 2004	1st Qtr 2005
Number of CRs coded as engineering fundamental HU issues	47	31
IRs Technical Rigor	18	4
IRs Procedural Adherence	13	6
Significant Revisions to Modifications.	7 (L1R10)	2 (L2R10)

* This includes pre-outage, outage execution and post outage testing.

- A review of the CAP data indicates that personnel are embracing procedure quality and adherence as a fundamental by the number of IRs being written to revise, clarify, or enhance procedures (i.e., Procedure Change Request Action (PCRA)) as a precursor activity rather than as a result of a breakthrough event.



Additional corrective actions have been planned or recently completed to address Human Performance.

A root cause investigation was performed on procedural adherence in October of 2003. In accordance with the CAP, an effectiveness review of the corrective action to prevent recurrence was performed and deemed to be indeterminate. Common Cause Analyses for procedure adherence were completed for all departments. Collectively, it was concluded that there was no adverse trend with procedure adherence in the area of continuous use procedures. The CCAs did confirm that there continues to be a challenge in compliance with administrative control procedures. Actions to address this issue have been added to the HPEP.

The HPEP has been updated with specific actions resulting from the investigations of human performance related events from both outage and non-outage periods. Specific to radiation worker performance, the following actions are being taken.

- Exelon will document in LaSalle Station Procedures or training material, the following corrective actions:
 - Revise initial radiation worker training material to highlight high radiation area (HRA) entry requirements and consequences for the radiation worker if requirements are not met;
 - Revise RWP instructions that allow HRA entry to state "high radiation entry brief required;"
 - Add warnings to worker acknowledgements on the computer screen during the access control electronic dosimetry log-in process;
 - Add the radiation protection aid for conducting HRA briefings; and,
 - Require a signature from transient refueling outage workers prior to issuance of dosimetry that acknowledges their understanding of HRA entry requirements and the consequences for violating them.
- During the first ten days, or longer as necessary, of the next two refueling outages, LaSalle will have greeters at primary access points to the Radiologically Controlled Area (RCA) to enhance awareness of radiological controls.
- For the next two refueling outages, all transient refueling outage workers, except as specifically authorized by the Radiation Protection Manager, will be required to attend and pass a dynamic learning activity on proper HRA entry.
- LaSalle will perform an industry benchmark evaluation of HRA controls, and evaluate changes to existing practices prior to the next refueling outage.
- In addition to the corrective actions already documented in Exelon's December 17, 2004 response, Exelon will require that Venture revise its Operating Procedures, which are applicable fleet-wide, to further assure compliance with high radiation area entry requirements and to specifically include the following requirements:
 - For a discussion of pertinent radiological practices at each daily shift brief;
 - That Venture employees who will work in radiation areas will read, understand and sign a pledge to attest to his/her commitment to follow all radiological requirements. Each pledge will be co-signed by the Venture site manager, project superintendent, or site ALARA coordinator and will be retained for a period of one year;

- That Venture superintendents will be present at select pre-job briefs involving HRA entries;
 - Venture will participate in Exelon RPM peer group meetings at least semi-annually to evaluate and take action on RP issues.
- Exelon will conduct a review of the implementation and effectiveness of its and Venture's corrective actions listed above. This review shall be conducted for at least the next two refueling outages at LaSalle. The results of each review will be made available for NRC review upon request. The review shall be conducted by knowledgeable individuals independent of the LaSalle facility.
- The LaSalle Plant Manager or Site Vice President will meet with contract leadership prior to each outage to establish personnel expectations in following radiological work requirements.

EGC is committed to continued improvement at LSCS. If you have any questions concerning this letter, please contact Mr. Terrence W. Simpkin, Regulatory Assurance Manager, at (815) 415-2800.

Respectfully,



Susan R. Landahl
Site Vice President
LaSalle County Station

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector – LaSalle County Station