



**Commonwealth Edison**

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Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

September 5, 1979

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

Subject: LaSalle County Station Units 1 and 2  
Supplemental Response to I.E. Report  
Nos. 50-373/79-13 and 50-374/79-10  
NRC Docket Nos. 50-373 and 50-374

- References (a): J. G. Keppler letter to B. Lee, Jr.  
dated August 17, 1979.
- (b): C. Reed letter to J. G. Keppler  
dated June 1, 1979.
- (c): C. Reed letter to J. G. Keppler  
dated July 20, 1979.

Dear Mr. Keppler:

The following is in response to your request for additional information (Reference (a)) regarding the subject inspection reports. It is our judgement, based on conversations with Mr. D. Hayes and P. Barrett of your staff, that the attached information satisfies that request.

In the event you have any additional questions in this regard, please direct them to this office.

Very truly yours,

*C. Reed*

Cordell Reed  
Assistant Vice-President

Attachment

cc: Mr. O.D. Parr, Chief  
Light Water Reactors - Branch No. 3  
Division of Project Management  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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ATTACHMENT

Supplemental Response  
To  
Notice of Violation

The following supplemental information is provided in response to the items of apparent noncompliance identified in Appendix A of the NRC letter dated May 1, 1979 as clarified by the NRC letter dated June 29, 1979. This supplemental response shall follow the format of the original response to the noncompliance transmitted in Reference (b).

- 1.A. The cables and components comprising the instrumentation for redundant post-accident tracking of the reactor pressure/level, addressed in FSAR Section 7.5.1.2, were incorrectly classified as non-safety related.

Corrective Action Taken and Results Achieved

Commonwealth Edison classified the components which are the subject of this apparent noncompliance as non-safety related because the pressure/level recorders in question were not seismically qualified. Section 7.5.2.2.b. 1 of the FSAR clearly indicates that these recorders are not seismically qualified, and the response to FSAR question Q031.52 reaffirms this position. Because conformance to applicable IEEE standards requires that Class 1E equipment (safety-related) be qualified to meet the environment in which it must operate, it was judged that the clearly stated exception to seismic qualification for the level and pressure recorders established the basis for classifying those components as non-safety related. The ancillary equipment was also classified non-safety related to prevent a safety/non-safety system isolation problem.

However, Commonwealth Edison has determined upon further review of this matter to upgrade the components in question, reclassifying them safety-related. A preliminary review of the equipment specifications and qualification records indicates that with the exception of the recorders, the installed equipment can be reclassified as safety-related. A complete review of the equipment certification including installation procedures will be conducted to assure the adequacy of the installed system. In the case of the reactor vessel pressure/level recorders, new equipment will be purchased for which seismic qualification can be demonstrated.

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The text of Chapter 7 of the LaSalle County FSAR will be revised to reflect the changes discussed above. In addition, Section 3.10 (Seismic Qualification of Category I Instrumentation and Equipment) of the FSAR and Q031.52 will be revised as required, along with any other design documents requiring revision.

#### Corrective Action to Avoid Further Noncompliance

A preliminary engineering review has been conducted of instrumentation in Section 7.5 and 7.6 of the FSAR to assure that appropriate safety-classification of equipment has been maintained. The apparent improper safety classification is judged to be a limited occurrence confined to the components cited. This conclusion is based on the fact that the equipment in question was knowingly classified non-safety related based on an explicit exception documented in the FSAR to which reference was made earlier. A detailed review of Sections 7.5 and 7.6 of the FSAR will be made to document the classification changes discussed above.

#### Date When Full Compliance Will Be Achieved

The equipment discussed in this report will be upgraded as required to satisfy the requirements of safety-related components. This effort will be completed prior to fuel loading. This extended period of time is necessary due to lead times associated with purchase of seismically qualified recorders.

The engineering assessment of the equipment certification to justify upgrading the ancillary equipment (cable and transmitters) will be completed by January 1, 1979. The reactor vessel pressure/level subsystem of the Post Accident Monitoring System will be verified to conform to all the requirements for safety-related equipment prior to fuel load.

- 1.C. Region III requests clarification of the planned efforts to inspect and verify the adequacy of the installation of fasteners for certain Class IE motor terminal connections.

In addition to the contractor material review and termination surveillance checklist revisions described in Reference (c), Commonwealth Edison will disassemble 10 electrical terminations completed prior to implementation of the revised surveillance checklist. At the request of Messrs. D. Hayes and P. Barrett of the Region III IE Office, Commonwealth Edison will notify Mr. Barrett of the times when the disassembly and bolt material verification will occur.

Since the lines for which the termination bolting material are in question have now been energized, system outages will be required to allow for this survey. The survey will continue through October, 1979 and will be integrated with the system pre-operational testing program so as not to delay preoperational testing. This approach was reviewed with Mr. D. Hayes on August 27, 1979.