



Commonwealth Edison

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August 24, 1983

Mr. James G. Keppler, Regional Administrator
- Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report Nos.
50-373/83-28 and 50-374/83-23
NRC Docket Nos. 50-373 and 50-374

Reference (a): J. F. Streeter letter to Cordell Reed
dated July 28, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. S. G. DuPont, L. A. Reyes, R. D. Lanksbury, and G. C. Wright on June 20 through July 22, 1983, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

CW Schroeder 8/24/83

for

D. L. Farrar
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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RESPONSE TO INSPECTION REPORT
50-373/83-28 and 50-374/83-23

1. NONCOMPLIANCE

10 CFR 50, Appendix B, Criterion XI, states, in part, "Test procedures shall include provisions for assuring that all prerequisites for the given test have been met...". Startup Manual Procedure LSU 400-1, Appendix A, Section 5.0, states, in part, "Test conditions which are different than those expected during normal or accident operation should be justified and documented in the system initial conditions and prerequisites section." Startup Manual Procedure, LSU 500-1, Section F.5, states, in part, "The System Test Engineer shall be responsible for verifying the prerequisites are satisfied prior to commencing a test."

Contrary to the above, a test condition existed that was different than those expected during normal or accident operation without being documented in the system initial conditions and prerequisites section of the Low Pressure Coolant Injection test portion of the Residual Heat Removal System Preoperational Test Procedure, PT-RH-201, in that the automatic initiation mode of the "B" and "C" loops of RHR were defeated by the Unit Separation Criteria. Additionally, the System Test Engineer failed to verify that the prerequisites of PT-RH-201, specifically those that were impacted by the Unit Separation Criteria were satisfied prior to commencing the test.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

A deficiency report (PT-RH-201 - 224) was written to document the failure of the system to respond as anticipated. Inspection of the panels and a review of the Unit 2 Jumper and Lifted Lead Log revealed several temporary circuit changes in effect. These changes were returned. Subsequently, the logic testing was satisfactorily performed.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

This noncompliance has been reviewed with all System Test Engineers. A listing of all temporary circuit changes for unit separation was obtained and specifically reviewed by System Test Engineers assigned to affected systems to ensure that no additional "surprises" would occur. In addition, a review was done of all outstanding temporary circuit changes which had been originated by operations personnel to prevent inadvertent actuations of any equipment during testing. As a result of this review, a consolidated set of jumpers and lifted leads has been put into effect. This consolidation has greatly reduced the number of outstanding circuit changes and simplified the task of determining whether the changes affect planned testing.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

2. NONCOMPLIANCE

10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, the following instances were noted during the performance of the Containment Integrated Leak Rate Test (CILRT) where an activity affecting quality was not accomplished in accordance with an approved procedure:

- a) Contrary the station test procedure LTS 300-4, the air supply header was vented and the spool-piece connecting the charging line to the containment spray line was removed prior to the completion of temperature stabilization.
- b) Contrary to station test procedure LTS 300-4, no entries were made in the CILRT events log between 2120 hours on June 28, 1983, and 0730 hours on June 29, 1983, even though actions were taken such as those noted in item a above, that should have been logged.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

These incidents were discussed at length with the System Test Engineer, emphasizing the importance of complying with both the intent and the words when using station procedures.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER COMPLIANCE

This noncompliance was discussed in meetings with all System Test Engineers, emphasizing the need to follow approved procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

3. NONCOMPLIANCE

10 CFR 50, Appendix B, Criterion XIV, states, in part, "Measures shall be also be established for indicating the operating status of structures, systems, and components of the nuclear power plant..., such as by tagging valves and switches, to prevent inadvertent operation."

Contrary to the above following completion of the licensee's valve lineup for the CILRT, the inspectors found that the Jet Pump Instrumentation Stop Valves in the TIP room had not been tagged to prevent inadvertent operation.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The valves in question were properly tagged and verified to be in the proper position after the problem was identified.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

This event has been discussed with all System Test Engineers. Emphasis is being placed on ensuring that tags and labels identifying equipment undergoing preoperational testing are properly installed.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All corrective actions have been completed.