



Commonwealth Edison
LaSalle County Nuclear Station
Rural Route #1, Box 220
Marseilles, Illinois 61341
Telephone 815/357-6761

May 10, 1991

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Dear Sir:

Licensee Event Report #91-005-00, Docket #050-373 is being
submitted to your office in accordance with
10CFR50.73(a)(2)(i).

for G. J. Diederich
Station Manager
LaSalle County Station

GJD/LRS/mkl

Enclosure

cc: Nuclear Licensing Administrator
NRC Resident Inspector
NRC Region III Administrator
INPO - Records Center
IDNS Resident Inspector

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1)

Docket Number (2)

Page (3)

LaSalle County Station Unit 1

0 | 5 | 0 | 0 | 0 | 3 | 7 | 3 | 1 | of | 0 | 4

Title (4)

Missed Technical Specification Surveillance On Containment Monitoring Due To Inadequate Pre-License Review

Event Date (5)			LER Number (6)			Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)
0 4	1 0	9 1	9 1	0 0 5	0 0	0 5	1 0	9 1	LaSalle Unit 2	0 5 0 0 0 3 7 4
										0 5 0 0 0 1 1

OPERATING
MODE (9)

5

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR
(Check one or more of the following) (11)

POWER LEVEL (10)	0 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	Other (Specify
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	in Abstract
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	below and in
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	Text)

LICENSEE CONTACT FOR THIS LER (12)

Name

TELEPHONE NUMBER

Leon Sanders, Technical Staff Engineer, Extension 2772

AREA CODE

8 | 1 | 5 | 3 | 5 | 7 | - | 6 | 7 | 6 | 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
A	I K			N					

SUPPLEMENTAL REPORT EXPECTED (14)

Expected Submission Date (15)

Month | Day | Year

Yes (If yes, complete EXPECTED SUBMISSION DATE)

X | NO

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On April 10, 1991 at 1230 hours with Unit 1 in Mode 5 (Refuel) and Unit 2 in Mode 1 (Run) at 0%/100% power respectively, it was determined that LaSalle Station had not performed a Technical Specification surveillance requirement on suppression chamber oxygen sampling. Technical Specification 3.6.6.2, was changed from taking an oxygen sample from Primary Containment to taking the oxygen sample from the Drywell and Suppression Chamber during pre-licensing (1981). LaSalle Operating Surveillance LOS-AA-W1, "Technical Specification Weekly Surveillances" performs sampling of the drywell on a weekly basis but did not get revised to include sampling of the suppression chamber.

The apparent cause of the event was due to an inadequate review of the Technical Specification change to determine procedures that required revisions.

The consequences of this event are minimal since the drywell and suppression chamber are inerted in parallel and the drywell free air space is larger than the suppression chambers free air space, therefore making it highly likely that a non-combustible mixture has been maintained in the suppression chamber.

LaSalle Operation Surveillance LOS-AA-W1, was revised and performed satisfactorily on April 10, 1991 and found the drywell and suppression chamber at 2.4% and 3.2% oxygen concentration respectively.

This event is reportable to the NRC pursuant to the requirements of 10CFR50.73(a)(2)(i) due to a condition prohibited by the plant Technical Specifications.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION												Form Rev 2.0	
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		Year	///	Sequential Number	///	Revision Number							
LaSalle County Station Unit 1	0 5 0 0 0 3 7 3	9 1	-	0 0 5	-	0 0	0 2	OF	0 4				
TEXT Energy Industry Identification System (EIIIS) codes are identified in the text as [XX]													

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIIS) codes are identified in the text as [XX].

A. CONDITION PRIOR TO EVENT

Unit(s): 1/2 Event Date: 04/10/91 Event Time: 1230 Hours

Reactor Mode(s): 5/1 Mode(s) Name: Refuel/Run Power Level(s): 0.0/100%

B. DESCRIPTION OF EVENT

On April 10, 1991 at 1230 hours with Unit 1 in Mode 5 (Refuel) and Unit 2 in Mode 1 (Run) at 0%/100% power respectively it was determined that LaSalle Station had not performed a Technical Specification surveillance requirement since initial reactor startup for each unit. This missed surveillance requirement was discovered during the investigation of another event when the Unit 2 Suppression Chamber inadvertently had Unit 1 Reactor Building air introduced into it (Deviation Report 1-2-91-011).

During pre-licensing (1981) of Unit 1 and Unit 2, when the Technical Specifications initially were being reviewed and approved by the station and the NRC, a Technical Specification change submittal was requested for specification 3.6.6.2, "Primary Containment Oxygen Concentration". This requested specification change had the requirement to verify the oxygen concentration in the primary containment at least once per seven days while in Operational Condition 1 (Run). The approved specification change also included a change to the specification title, which changed to "Drywell and Suppression Chamber Oxygen Concentration" and changes to the Limiting Condition for Operation (LCO) and Surveillance Requirement sections, which changed "primary containment" to "drywell and suppression chamber". After approval from the NRC, the station proofed and reviewed the changes. It is believed that the reviewer determined that these changes were strictly editorial, since the drywell and suppression chamber make up the primary containment, and thus required no procedure or surveillances revisions. In fact, the change required oxygen concentration to be verified in two locations (drywell and suppression chamber) instead of just the primary containment, as per the original Technical Specification change request.

This event is reportable to the NRC pursuant to the requirements of 10CFR50.73(a)(2)(i) due to a condition prohibited by the plant Technical Specifications.

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				Number								
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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]												

C. APPARENT CAUSE OF EVENT

The requested change submitted to the NRC was changed at the NRC to reflect that primary containment samples were to be taken from the drywell and the suppression chamber. During the pre-licensing of the station it was not uncommon for the NRC to include editorial changes back with approved submittals. It is believed that the station reviewer of the approved change thought that this change was editorial only, due to the primary containment being the same as the drywell and suppression chamber, and did not further pursue a change to the sampling procedure. The apparent cause of the event was due to an inadequate review to determine the effects of the Technical Specification change on applicable station procedures.

D. SAFETY ANALYSIS OF EVENT

Prior to this event, the drywell oxygen concentration has been monitored (weekly) in accordance with LOS-AA-W1 which did not explicitly state to monitor the suppression chamber free air space. The consequences of this event are minimal since the drywell and suppression chamber are inerted in parallel and the drywell free air space is larger than the suppression chambers free air space, therefore making it highly likely that a non-combustible mixture has been maintained in the suppression chamber. LOS-AA-W1 was performed satisfactorily on April 10, 1991 and found the drywell and suppression chamber at 2.4% and 3.2% oxygen concentration respectively. These readings provide assurance that the suppression pool was inerted at the same time the drywell was inerted. Had an accident occurred and suppression chamber pressure increased, the free air space in the drywell and suppression chamber would mix together so that a oxygen sample from the drywell would be a representative sample of the oxygen concentration in the drywell and suppression chamber. Safe operation of the plant was not affected.

E. CORRECTIVE ACTIONS

Once the discovery of the missed surveillance requirement was made, corrective actions were immediately taken to check the Unit 2 drywell and suppression chamber for oxygen concentration and to revise LOS-AA-W1. A procedure revision to LOS-AA-W1 was initiated and, when approved on April 10, 1991 the procedure was performed satisfactorily and found the drywell and suppression chamber at 2.4% and 3.2% oxygen concentration respectively.

LaSalle Administrative Procedure LAP-1200-12 "Operating License Technical Specification Changes" has been developed to provide guidance for properly preparing and processing Technical Specification Changes. This procedure contains checklists for review of procedures that may be affected by the change and involves a tracking mechanism to ensure their completion.

This type of missed surveillance has been determined to be an isolated case and no further review is warranted.

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LaSalle County Station Unit 1			0	5	0	0	0	3	7	3	9	1	-	0	0	5	-	0	0	0	4	OF	0	4
TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]																								

F. PREVIOUS EVENTS

LER Number	Title
374/88-004-00	Missed Technical Specification Surveillance Due To Personnel Error.
374/88-006-00	Missed Loose Parts Surveillance Due To Personnel Error.
374/89-015-00	Missed Technical Specification Surveillance On Standby Liquid Control System Due To Administrative Error.

G. COMPONENT FAILURE DATA

There were no component failure.