



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

May 20, 1991

Mr. A. Bert Davis  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road-R111  
Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2  
Response to Open Item  
Inspection 50-373/91003; 50-374/91003  
NRC Docket Nos. 50-373 and 50-374

Reference: T.O. Martin letter to Cordell Reed dated  
March 22, 1991 transmitting NRC Inspection  
Report 50-373/91003; 50-374/91003

Dear Mr. Davis:

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Open Items which were transmitted with the referenced letter and Inspection Report. The four Open Items identified weaknesses in the LaSalle EOP program. Specifically, weaknesses were noted in the Writer's Guide, the Verification and Validation Program, and the Setpoint Document. In response to the observation that the weaknesses identified at LaSalle were similar to those identified at other CECO facilities, it is our intent that these are the types of issues which the Quality Programs and Assessment Department's Lessons Learned Functional Group will address. The Lessons Learned Group was recently established and will be facilitating the reviews of these types of issues on a corporate basis.

CECo understands the significance of these items individually as well as collectively and has undertaken corrective actions to preclude similar weaknesses. CECO's response to the identified Open Items is provided in the following attachment.

If your staff has any questions or comments regarding this response, please refer them to Annette Denenberg, Compliance Engineer, at (708)515-7352.

Very truly yours,

T.J. Kovach  
Nuclear Licensing Manager

GAD/TJK/gp

Attachment

cc: B. Siegel, Project Manager - NRR  
T. Tongue, Senior Resident Inspector  
NRR Document Control Desk

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**Open Item 373(374)/91003-01**

The control and documentation of the basis/justification for setpoints, plant specific data, and input data to calculations was not adequate. For example, vendor technical information (setpoint documents) used in preparation of the EOP's was not approved in accordance with LAP-100-15, "Control of Vendor Technical Information." Further, numerous examples were identified in which the basis for setpoints in the EOP's was not documented and the setpoint was not controlled in the EOP program. The Setpoint Document was needed as part of the technical/design basis for the EOP's, and as such needed to be controlled and maintained.

**RESPONSE:**

Input data used for EOP calculations or actions will be reviewed for accuracy and adequacy. Revisions to calculations and the affected procedures will be conducted following completion of the reviews.

LAP-100-15 will no longer be used in the preparation of EOPs. LAP-820-11TE, "Emergency Operating Procedure Setpoint Document," is being created to replace LAP-100-15 for EOPs. LAP-820-11TE will serve to control and document the basis and justification for setpoints, and plant specific data, and for EOPs input data to calculations.

LAP-820-11TE will consist of several tables, generally outlined in the following format:

- 1) EOP Setpoints/graphs
  - a. Setpoint name
  - b. Setpoint value
  - c. PSTG reference
  - d. EOP reference
  - e. Calculation reference
- 2) Calculation Input Data (general plant data)
  - a. Data name/code (as used in calculations)
  - b. Data value
  - c. Source of input
  - d. Calculation references
- 3) Calculation Input Data (RPV level instrument data)
  - a. Data name/code (as used in calculations)
  - b. Data value
  - c. Source of input

In addition, there will be a guideline for use in identifying changes needed to input data and/or calculations. This will include guidance for calculation methods and reviews of results.

These actions will be completed by July 31, 1991.

The specific items identified in Appendix B and Appendix C of the Inspection Report are being tracked by Commonwealth Edison's (CECo) Nuclear Tracking System. Actions related to Open Item 373(374)/91003-01 are scheduled for completion by February 28, 1992.

**Open Item 373(374)/91003-02**

Numerous deficiencies were identified during walkdowns of the support procedures; however, walkdowns of control room actions resulted in few problems. Deficiencies were generally in the areas of: emergency lighting, labeling, support procedures' details, equipment accessibility, and tool and material availability and control.

**RESPONSE:**

Emergency lighting had been addressed in LaSalle County Station's Modification Program. Several installations of Emergency Lighting equipment have already improved LaSalle's capability to illuminate various areas of the plant. These modifications will be reviewed for their affect on lighting for EOP related activities. The need for additional emergency lighting units will be reviewed and further modifications initiated by August 31, 1991.

A new station procedure is being created to direct control of the various types of operator aides, labeling, and tools necessary to successfully implement various operating procedures. It is Commonwealth Edison's expectation that the implementation of this procedure will improve labeling and the accessibility of the required tools. These actions will facilitate the expeditious completion of the operator's job in emergency or abnormal conditions. Following implementation, LaSalle Station will perform a review of this procedure to demonstrate its adequacy. Corrective actions resulting from this review will be identified and implemented. The review is scheduled for completion by December 31, 1991.

The specific items identified in Appendix B and Appendix C of the Inspection Report are being tracked by CECO's Nuclear Tracking System. Actions related to Open Item 373(374)/91003-02 are scheduled for completion by February 28, 1992.

**Open Item 373(374)/91003-03**

The Verification and Validation documentation for EOPs and support procedures was not complete or well presented. The V&V procedures were generally not adequate in that the support procedures were not included in the verification, and the V&V program did not contain sufficient detailed guidance and objective criteria. The validation effort performed for the support procedures was not sufficient to ensure that the local actions could be performed as written or physically accomplished in a timely manner.

**RESPONSE:**

The initial validation exercise data was incomplete and not well documented. The information that was gathered will be assembled, completed, and retained as a permanent record. This is scheduled for completion by June 30, 1991.

The validation and verification programs for EOPs will be reviewed in detail to assure that the EOP inspection concerns are addressed. A revalidation of the affected procedures will be performed upon the completion of any changes. The next series of LGA revisions will incorporate the experience gained from the training modules of License Requalification Training since implementing the new format. In addition, human factor concerns identified subsequent to these changes will be addressed. This is scheduled for completion by December 31, 1991.

The support procedures will be rewritten upon completion of the Support Procedure Writer's Guideline (in response to Open Item 373(374)/91003-04). The validation of the support procedures will be reperformed addressing the EOP inspection concerns. Completion is scheduled for February 28, 1992.

The specific items identified in Appendix B and Appendix C of the inspection report are being tracked by Commonwealth Edison's Nuclear Tracking System. Actions related to Open Item 373(374)/91003-03 are scheduled for completion by February 28, 1992.

**Open Item 373(374)/91003-04**

The LaSalle Writer's Guide (WG) may not be adequate to maintain the quality of the EOPs in future revisions of the LGA flowcharts. The WG contained internal inconsistencies and lacked specific guidance where needed. There was no specific Writer's Guide for the support procedures other than the process used for other plant procedures. This led to inconsistencies in content, format, and level of detail among support procedures. The support procedures are considered part of the EOP program and should be written and maintained with quality requirements equivalent to those required for the LGA's.

**RESPONSE:**

The LGA Procedure Writer's Guideline is being modified to remove inconsistencies and to improve guidance. The updated Guideline is scheduled for completion by June 30, 1991.

The LGA Support Procedures are being reviewed for content, format, and implementation efficiency. The development of a Support Procedures Writer's Guideline has been initiated by LaSalle Station. The Support Procedures Writer's Guideline will address tool lists, procedure details, operator aids and consistency of format. A draft of this Guideline is scheduled for completion by October 1, 1991.

The specific items identified in Appendix B and Appendix C of the Inspection Report are being tracked by CECO's Nuclear Tracking System. Actions related to Open Item 373(374)/91003-04 are scheduled for completion by February 28, 1992.