



Commonwealth Edison

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September 20, 1982

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

Subject: LaSalle County Station Unit 1
Response to NRC Inspection
Report 50-373/82-30
NRC Docket No. 50-373

Reference (a): R. L. Spessard letter to Cordell
Reed dated August 19, 1982.

Dear Mr. Keppler:

Reference (a) transmitted Inspection Report 50-373/82-30 to Commonwealth Edison. Commonwealth Edison Company's response to the Notice of Violation is contained in the attachment.

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 questions in this matter, please direct them to this office.

Very truly yours,

L. O. DelGeorge
Director of Nuclear Licensing

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Enclosure

cc: NRC Resident Inspector - LSCS

5054N

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ATTACHMENT

NOTICE OF VIOLATION

ITEM OF NONCOMPLIANCE

1. Paragraph 2.C.(2) of facility operating license NPF-11 states in part that, "The licensee shall operate the facility in accordance with the Technical Specifications...."

Contrary to the above requirement, the following items represent a failure on the part of the licensee to properly implement Technical Specification requirements:

- a. On April 19, 1982, the channel check requirements for the Reactor Building and Fuel Pool Vent Exhaust Monitoring System contained in Technical Specification 4.3.2.1 were not performed.
- b. During the period April 18-28, 1982, the surveillance requirements of Technical Specification 4.3.7.11 were not satisfied for the Station Vent Stack Radiation Monitor System.
- c. During the period May 1-3, 1982, action statement requirements of Technical Specification 3.3.7.11 for an inoperable station vent stack flow recorder were not satisfied.
- d. During the period April 17, 1982 through May 6, 1982, fire doors were not inspected in accordance with Technical Specification 4.7.6.2.
- e. On May 5, 1982, it was discovered that the Unit 1, Division II Battery was inoperable. Action statement requirements of Technical Specification 3.8.2.4 were not satisfied in that unit tie breakers to the corresponding Unit 2 Division were not closed.
- f. Technical Specification 3.3.7.11 requires that with the Main Stack Monitoring System inoperable, grab samples be taken for noble gas emitters, continuous monitoring be implemented for iodines and particulates, and flow rates be estimated every four hours. Contrary to the above requirements, on May 2, 1982, the Main Stack Monitoring System was made inoperable as a result of inadequate system reviews prior to taking bus 141Y out-of-service for maintenance and compensatory action was not implemented for approximately seven hours.
- g. Technical Specification 3.3.7.10 requires that the radioactive liquid effluent monitoring instruments for Service Water and RHR Service Water be operable with alarm/trip setpoints determined in accordance with the Offsite Dose Calculation Manual (ODCM). Contrary to the above requirements, the Service Water and RHR Service Water Systems were operated from April 19, 1982, through May 11, 1982, with alarm/trip setpoints established nonconservatively with respect to the ODCM.

RESPONSE

Corrective Action and Results Achieved

Inspection Report 50-373/82-30 identified the above noncompliances as one item of noncompliance with respect to Paragraph 2.C.(2) of the LaSalle Operating License NPF-11. In the text portion of Report 82-30 License Event Report Numbers were identified for each event listed above.

The events occurred during the first three weeks following receipt of License NPF-11 and, as each LER indicated, corrective action was taken. Furthermore, an On-Site Review investigation was conducted on May 24, 1982 to determine if there was an abnormal trend in LERs associated with personnel errors. This On-Site Review was conducted by the Station Superintendent with the Assistant Superintendent of Operation, the Assistant Superintendent of Administrative and Support Services, the Senior Operating Engineer and the Technical Staff Supervisor as participants. The actions taken as a result of this On-Site Review were reported in a LaSalle County Station Special Report to Mr. J. G. Keppler dated June 17, 1982.

Corrective Action to Avoid Further Non-Compliance

The Special Report identified above also indicated that as of June 10, 1982, the same On-Site Review Committee determined that additional actions should be taken in order to limit the number of such events as listed above. Actions 1, 2, 5, 6, 7, & 9 as identified in the Special Report have been satisfactorily completed.

Date of Full Compliance

Full compliance with the Technical Specifications references above has been achieved.

ADDITIONAL COMMENTS ON INSPECTION REPORT 50-373/82-30

Inspection Report 82-30 text indicated that the item of noncompliance was that the licensee did not take prompt and effective corrective action to correct personnel problems associated with interpreting and implementing Technical Specifications identified in the above LERs.

Interpretation of Technical Specifications at LaSalle County has been an item of great concern since 1975 and many manhours have been expended between then and issuance of the LaSalle License. Almost every effort that was made by Commonwealth Edison in the area of Technical Specification clarification for personnel use was not accepted by NRR. Therefore, interpretation of Technical Specifications is a difficult task. The document is not a user orientated document nor has it been formatted in any type of human factors logic.

An example of a Technical Specification that is not user oriented is 4.3.2 which was cited in item 1.a of the noncompliance. The wording in T.S. Table 3.2.2-1 ** was interpreted by one user as a 3 conditional "and" statement while another user interpreted the ** as a 3 conditional "or" statement and thus an LER was promptly issued.

Commonwealth Edison Company believes that "interpretation" of the LaSalle Technical Specifications has been properly done by the respective users since the issuance of the LaSalle Technical Specification as Appendix A to NPF-11. The two major problem areas in standardizing the interpretation of the Technical Specifications have been the inconsistent use of the English language and the format of the different sections of the Technical Specification.

In the Text of Inspection Report 82-30, it was indicated that "prompt and effective corrective action" was not taken. As reported above, prompt action was taken as indicated by the respective LERs that were issued and the On-Site Reviews that were conducted as a combined look at the multiple LERs during the initial 3 week period following receipt of NPF-11.

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ITEM OF NONCOMPLIANCE

2. 10 CFR 50.59 requires, in part, that, the holder of a license authorizing operation of a production or utilization facility may (i) make changes in the facility as described in the Safety Analysis Report without prior Commission approval, unless the proposed change, test or experiment involves a change in the Technical Specifications incorporated in the license or an unreviewed safety question. An unreviewed safety question is deemed to exist. Further, for changes performed pursuant to 10 CFR 50.59, a written safety evaluation must be completed providing the basis for the determination that an unreviewed safety question is not involved.

Technical Specification 6.1.G.2 requires, in part, that the On-Site Review and Investigative Function shall, "Review all proposed changes or modifications to plant systems that affect nuclear safety."

Technical Specification 3.6.5.3 requires, in part, that two independent Standby Gas Treatment Subsystems shall be operable when irradiated fuel is being handled in the secondary containment and during core alterations and operations with a potential for draining the reactor vessel.

Contrary to the above requirements, the Standby Gas Treatment System was modified without review on April 25, 1982. The modifications performed involved lifting leads which made the system inoperable to Division II initiating signals and made the system susceptible to single failure. During the period April 25-30, 1982, core alterations were continued in the form of fuel loading with the Standby Gas Treatment System inoperable.

Response

The lifted leads were immediately relanded after determining that they were the cause of valves 1VG001 and 2VG001 failing to open upon the simulated Div. II initiation signal.

Both Unit 1 and Unit 2 SBGT trains were fully operational by 1113 hours on May 11, 1982.

Corrective Action Taken to Avoid Further Noncompliance

As of September 1, 1982, the practice of lifting leads and performing other "Temporary System Changes" (i.e., Electrical jumpers and relay blocks, blanked flanges and spoolpiece insertions) is governed at LaSalle by the newly approved LAP 240-6, "Temporary System Changes to Unit 1 Systems and Equipment and Common and Unit 2 Systems and Equipment Required for Unit 1 Operation." This procedure calls for the completion of 10 CFR 50.59 Safety Review prior to (or in the case of backshift action, on the first working day following) the authorization and implementation of any Temporary System Change.

Date of Full Compliance

Full compliance has been achieved.

Additional Comment on this noncompliance

NRC Inspection Report 50-373/82-30, Text describes the condition of the Standby Gas Treatment System during the April 25, 1982, to May 11, 1982, time period as:

"Given that, SBGT would not have initiated in response to Division II of the above signals, the entire system was rendered technically inoperable. This position is reinforced by the fact that a failure of the O Diesel Generator, which powers Division 1 logic, would have prevented the sysetm from responding to any initiating condition."

A more accurate description of the SBGT System condition is:

Given that, SBGT local suction valves 1VG001 and 2VG001 would not have opened in response to Division II of the above signals, the entire system was rendered technically inoperable. However, an alternate system SBGT suction path was provided from the Reactor Building Ventilation return air riser via the normally open 1VQ041 valve, which may have provided adequate flow for SBGT to meet its design function had a Division II initiation signal occurred. In addition, Division 1 SBGT initiation logic was fully operational with both normal and alternate power supplies available.

Item of Noncompliance

3. Technical Specification 3.4.3.1 requires, in part, that in Operational Mode 3, two leakage detection systems be operable. Technical Specification 4.4.3.1 specifies that a functional test be performed on the three leakage detection systems at least every 31 days.

Contrary to the above requirements, on June 5, 1982, Unit 1 entered Operational Mode 3 with no operable leakage detection systems. The systems had not been functionally tested within 31 days of entering Mode 3.

Response

The Technical Specification noncompliance was reported in LaSalle County Station Licensee Event Report 82-035/03L-0 dated June 29, 1982. The immediate corrective action taken was to promptly restore the required leakage detection systems to an operable status by completing the functional test on the Primary Containment air cooler condensate flow rate instrumentation and the Primary Containment Sump Flow Monitoring System.

Corrective Action Taken to Avoid Further Noncompliance

The subject of Technical Specification adherence was addressed in a Special Report Letter to J. G. Keppler from R. H. Holyoak dated June 17, 1982. In the Special Report it was stated that

A review of surveillance activities in the Instrument Maintenance Department would be conducted on a sample basis to determine if surveillances are scheduled and current. This review has been completed satisfactorily and documented in LaSalle On-Site Review Number 81-21.

In LER 82-035/03L it was also reported that the Instrument Maintenance Department would review Technical Specification responsibilities and verify that the assignment is reflected on the computer listing of Instrument Surveillance Status or identified for incorporation in the listing. This action has been completed satisfactorily.

Date of Full Compliance

Currently, Instrument Surveillances are being tracked by means of a manual tracking system and a computer listing. These mechanisms should ensure compliance with Technical Specification 3.4.3.1.