



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

DOD

February 25, 1991

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

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report Nos.
50-373/90026; 50-374/90027
NRC Docket Nos. 50-373 and 50-374

Reference: (a) W.D. Shafer letter to C. Reed dated
January 24, 1991.

Dear Mr. Davis:

This letter is in response to the inspection conducted by Messrs. T. Tongue, C. Phillips, T. Laughton and H. Simons of your staff and assisted by J. Roman of the Illinois Department of Nuclear Safety pertaining to certain activities at the LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison response to the Level IV Notice of Violation is provided in the following attachment.

If there are any questions or comments regarding this matter, please contact this office.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

cc: Senior Resident Inspector - LSCS

ZNLD745/10

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ATTACHMENT

Commonwealth Edison LaSalle County Station Response to Notice of Violation

LaSalle County Station continues to place emphasis on Corporate and Station policies which require strict adherence to procedures. In both instances of the cited failures to follow procedures, the individuals and departments were counselled to ensure that Station awareness is re-heightened concerning this issue. LSCS is committed to safe operation and recognizes the importance of eliminating mistakes which result from failure to follow procedures as a vital component in achieving this goal. Review of the applicable procedures revealed them to be adequate, and both violations were specific to personnel failure to follow approved procedural steps. The review however, provided insight which is resulting in re-examination of some practices, which will help minimize the risk of future events. Attached are responses to the individual examples identified within the inspection report.

In addition, the inspection report noted a potential concern about the adequacy of the station's procedures. The station currently has in excess of 10,000 procedures, all of which are periodically reviewed for possible improvements. Major rewrite/reformat efforts are in progress for mechanical, electrical, and instrument procedures, and are being considered for operating procedures. These ongoing enhancements represent more than five percent of the station's total workload. The station believes that the enhancements being made will improve usability and reduce the number of procedure related errors.

VIOLATION: IR 50-374/90027-01A

10 CFR 50, Appendix B, Criteria V, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

- a. On December 17, 1990, while performing LIS-MS-406, Condenser Low Vacuum Main Steam Isolation Functional Test on Unit 2, an Instrument Maintenance Technician performed steps of the procedure out of sequence resulting in an unplanned Primary Containment Isolation System Group I isolation.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The isolation signal was reset immediately and the surveillance for that channel was completed satisfactorily.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The Instrument Maintenance technician involved was counselled on the importance of following a procedure as it is written in sequential order and to contact his supervisor for clarification concerning unsure procedural steps. He was also reminded that there were no exceptions in deviating from the procedure sequence without an approved procedure change. Additionally, he was reminded to take the procedure with him to perform work, and that it is unacceptable to work from the attachment.

This event was tailgated with the Instrument Maintenance Department at the next weekly communication meeting, with emphasis on following procedures in the sequential order and ensuring that one channel is reset before proceeding to the next.

A long term action, which was already in progress, is the reformatting of the Instrument Maintenance procedures to incorporate most of the signoff into the body of the procedure eliminating most of the attachments currently used. This is scheduled for completion in late 1995.

THE DATE OF FULL COMPLIANCE

Full compliance has been achieved.

ZNLD745/12

VIOLATION: IR 50-374/90027-01B

10 CFR 50, Appendix B, Criteria V, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

- b. On December 19, 1990, it was discovered that a clerk had failed to place copies of the procedure LG-1-1, Unit Startup, in a file drawer with a new revision, as required and identified by station administrative procedure LAP-820-3, Procedure Distribution. This resulted in the commencement of a reactor startup using the wrong procedure revision.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

A review of the newer revision showed that none of the changes made affected steps which had been performed. The proper procedure revision was obtained and the startup was continued as planned. All operating forms files have been verified to have the most current revisions.

CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

LAP-100-40, Procedure Use and Adherence Expectations, was issued to describe how to verify that one has the most up to date revision of a particular procedure. A General Information Notification (GIN 90-101) was issued for all plant personnel to review the portions of LAP-100-40, which pertain to the proper handling of all procedures, whether obtained from a controlled file, or a form file.

The clerical guidelines for procedure updates includes direction that the form file will be reviewed and out-dated forms destroyed prior to updating the procedure set.

THE DATE OF FULL COMPLIANCE

Full compliance has been achieved.