



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

November 9, 1990

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 I.R. 373/90022 and 374/90023
NRC Docket Nos. 50-373 and 50-374

Reference: (a) M.A. Ring letter to C. Reed dated
October 11, 1990.

Dear Mr. Davis:

This letter is in response to the NRC special safety team inspection conducted by Messrs. M.J. Kopp and G.M. Hausman of your staff on September 17 through September 21, 1990 at LaSalle County Station. The purpose of this inspection was to follow up unresolved items previously identified relative to the implementation of commitments pertaining to Regulatory Guide 1.97.

Reference (a) indicated that certain activities appeared to be in deviation from commitments which were made in previous correspondence with the Commission. The Commonwealth Edison Company response to the identified deviation is provided in the following attachment.

If you have any questions regarding this matter, please contact this office.

Very truly yours,

W.E. Morgan
Nuclear Licensing Administrator

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DEVIATION

Regulatory Guide (RG) 1.97, Revision 2, Section C, Paragraph 1.3.1.b, requires for Category 1 instrumentation that redundant or diverse channels be electrically independent and physically separated from each other and from equipment not classified important to safety in accordance with Regulatory Guide 1.75, "Physical Independence of Electric Systems," up to and including any isolation device.

Contrary to the above, as of September 21, 1990, resistors, which are not acceptable isolation devices because they have not been adequately tested, were used to isolate RG 1.97, Category 1 reactor vessel level instrument loop LT-1(2)B21-26BA from the nonsafety-related Startrec system.

RESPONSE

1. The Reason for the Deviation:

Commonwealth Edison Company (CECo) does not agree that the current configuration for the reactor vessel level instrument loop (1/2B21-NO26BA) is a deviation from LaSalle County Station's commitment to Regulatory Guide (RG) 1.97. It is our position that this configuration meets LaSalle County Station's electrical separation criteria which meets the requirement of Regulatory Guide 1.75, Rev. 1 with exceptions as noted in Appendix B of the LaSalle County FSAR. Rev. 1 of RG 1.75 endorses IEEE Standard 384-1974. Section 3 of IEEE-384-1974 defines an isolation device as "a device in a circuit which prevents malfunctions in one section of a circuit from causing unacceptable influences in other sections of the circuit or other circuits". Further, IEEE-384 indicates that analysis or testing can be used to demonstrate that Class 1E circuits are not degraded below an acceptable level. Our analysis (Calculation No. CID-MISC-08) shows that the Class 1E instrument loop will not be degraded below an acceptable level due to a failure in the Startrec System. Therefore, it is our position that the 22K resistors adequately function to isolate the Non-class 1E Startrec System from the instrument loop for Reactor Vessel Level Transmitter 1/2B21-NO26BA.

2. The Corrective Actions that have been Taken and the Result Achieved:

An analysis (Calculation No. CID-MISC-08) was completed which shows that the Class 1E circuit will not be degraded below an acceptable level due to a failure in the Startrec System. This analysis was submitted for the NRC's review with CECo's letter of March 2, 1989, from W.E. Morgan (CECo-NLA) to A. Bert Davis (NRC).

3. The Corrective Actions that will be Taken to Avoid Further Deviations:

As indicated above, CECo does not believe the current configuration for the reactor vessel level instrument loop is a deviation from LaSalle County Station's commitment to RG 1.97. However, CECo will test the resistors to demonstrate they are capable of isolation the maximum credible fault.

4. The Date when Your Corrective Actions will be Completed:

CECo will submit the test results to the NRC by April 30, 1991.