



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

April 7, 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 Item of Noncompliance  
Inspection Report 50-373/82-06  
NRC Docket No. 50-373

Reference (a): R. L. Spessard letter to Cordell  
Reed dated March 9, 1982.

Dear Mr. Keppler:

Attached please find Commonwealth Edison Company's response  
to the item of non-compliance transmitted by Reference (a).

To the best of my knowledge and belief the statements  
contained in the attachment are true and correct. In some respects  
these statements are not based on 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 there are any further questions on this matter, please  
contact the Nuclear Licensing Department.

Very truly yours,

*W. L. Stiede*

W. L. Stiede  
Assistant Vice President

lm

Attachment

cc: NRC Resident Inspector - LSCS

SUBSCRIBED and SWORN to  
before me this 8th day  
of April, 1982

*Rosalie A. Penta*  
Notary Public

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## ATTACHMENT

### Item of Non-Compliance

10 CFR Part 50, Appendix B, Criterion 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."

10 CFR 50, Appendix B, Criterion XIV, requires measures to be established to indicate the operating status of systems and components, such as by tagging valves, to prevent inadvertent operation.

Quality Procedure 11-2 states in Section 5.4 that "Station staff under the direction of the Station Superintendent will operate equipment and systems in accordance with approved operating procedures and as required by the Preoperational or Startup test procedures."

Quality Requirement 14.0 states in Section 14.3 "STATUS CONTROL" that "methods of control will be provided through construction and Station Operating Procedures which describe the use of forms, tags, and logging methods."

Station procedure LAP 240-3, Electrical Jumper and Relay Block and Lifted Electrical Leads, establishes the administrative controls necessary for the installation and removal of electrical leads and jumpers. The Shift Engineer has the daily responsibility to verify the installation or removal and document these actions with appropriate master log entries.

Station procedure LAP 820-5 states that the status of system valves shall be verified using mechanical checklists.

Contrary to the above:

- a. On December 5, 1981, during a instrument line hydrostatic test, valve 1B21 F371, which was tagged out-of-service in the closed position, was in fact not closed. (373/82-06-01A)
- b. On December 6, 1981, valve 1DG032, which is in the cooling water line to the Low Pressure Core Spray (LPCS) pump, was found closed. The mechanical checklist, LOP-DG-08M, requires the valve to be open (listed as "locked open"). This resulted in the LPCS pump running without cooling water, which contributed to the running of the LPCS pump while temperatures were above the alarm limits. (373/82-06-01B)

- c. On December 6, 1981, LPCS pump temperature thermocouple leads were found to have been determined without any authorizing documentation and without operations department knowledge. This contributed to the LPCS pump being run while temperatures were above alarm limits.  
(373/82-06/01C)

Corrective Action and Results Achieved

(373/82-06-01A) Valve 1B21-F371 was found cracked open, after the inadvertant spraying of water on some workers in the reactor vessel. The valve was subsequently closed and an investigation into the cause of the apparent violation of the Out-of-Service procedure was made. It is thought that the reason for the valve not being fully closed was due to the stiffness of the valve on closure combined with an insufficient check of valve tightness of closure. This is believed to be an isolated incident.

(373/82-06-01B) Valve 1DG032 was found valved out. The valve was unable to be operated due to a broken keyway in the valve handle. The valve appeared to be partially open. The valve tag described it as the Diesel Cooling Water outlet valve and there had been no problem with Diesel Generator Cooling. Manual valve 1DG032 was repaired immediately upon discovery, with parts from the Unit 2 counterpart. The valve was opened as required by procedure prior to subsequent pump runs. The LPCS Pump Motor was determined to have not been damaged by satisfactory test results of motor vibration and oil sample tests.

(373/82-06-01C) Investigation revealed that the loss of temperature indication for the LPCS Pump Motor bearings was due to leads having been determined at the computer and a broken thermocouple lead. The broken lead was repaired, and the computer leads were reterminated after it could not be determined for what reason the leads had been disconnected.

Corrective Action to Avoid Further Noncompliance

(373/82-06-01A) Administrative corrective action has been taken to prevent future recurrences. A procedure change has been made to the LAP 900-4, Equipment Out-of-Service Procedure, which requires verification by a second person of physical isolation points for Safety Related equipment outages.

(373/82-06-01B) Administrative corrective action is being taken to prevent future recurrences. It was noted during a review of the incident that the mechanical checklist, LOP-DG-08M, listed the valve name of 1DG032 in a manner that was unclear for describing the valve's purpose for providing cooling water to the LPCS Pump Motor. A procedure revision will be made to clarify the valve name of 1DG032 on LOP-DG-08M.

(373/82-06-01C) Administrative corrective action is being taken to prevent future recurrences. An Operating Standing Order will be issued to use the process computer to monitor equipment parameters when appropriate. In addition, a visual inspection of safety related electrical panels in the plant is to be performed checking for unassigned jumpers and lifted leads prior to fuel load.

Date of Full Compliance

(373/82-06-01A) Double verification of physical isolation points has been approved by procedure revision 13 of LAP 900-4 for present station usage.

(373/82-06-01B) The procedure revision to LOP-DG-08M shall be completed by 4-15-82.

(373/82-06-01C) The Standing Order for monitoring equipment parameters will be issued by April 15, 1982. The visual inspection of electrical panels shall be completed prior to fuel load.