



Commonwealth Edison

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April 23, 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
50-373/82-12
NRC Docket No. 50-373

Reference (a): R. L. Spessard letter to Cordell Reed
dated March 25, 1982

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. S. E. Shepley, L. A. Reyes, and N. Chrissotimos on February 8-26 and March 1-26, 1982 of activities at LaSalle County Nuclear Station Unit 1. Reference (a) indicated that certain activities appeared to be in non-compliance with NRC requirements. The Commonwealth Edison Company response to the notice of violation is provided in the enclosure.

To the best of my knowledge and belief the statements contained herein and in the enclosure 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 you have any questions in this matter, please direct them to this office.

Very truly yours,

L. O. DelGeorge
Director of Nuclear Licensing

Enclosure
cc: NRC Resident Inspector - LSCS

SUBSCRIBED and SWORN to
before me this 23rd day
of April, 1982

Notary Public
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Enclosure

Item of Apparent Non-Compliance

10 CFR 50, Appendix B, Criterion II, requires in part, that activities affecting quality be accomplished under suitable controlled conditions, such as adequate cleanliness. 10 CFR 50, Appendix B, Criterion XIII requires, in part, that measures be established to control the storage and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.

The Quality Assurance Program, Quality Requirement QR2.0, contains Commonwealth Edison Company commitment to the regulatory positions of Regulatory Guide 1.38, Revision 2, and Regulatory Guide 1.39, Revision 2. The regulatory positions of Regulatory Guides 1.38, Revision 2 and 1.39, Revision 2, endorses the requirements of ANSI N45.2.2-1972 and N45.2.3-1973 respectively. ANSI N45.2.2-1972, Section 6.2, states, in part, that "Cleanliness and good housekeeping practices shall be enforced at all times in the storage areas. The storage areas shall be cleaned as required to avoid the accumulation of trash, discarded packaging materials and other detrimental soil: The use or storage of food, drinks...in any storage area shall not be permitted...Periodic inspections shall be performed to assure that storage areas are being maintained." Section 6.5 states, in part, that "Items released from storage and placed in their final locations within the power plant, shall be...cared for in accordance with the requirements of Section 6 of this standard." ANSI N45.2.3-1973 requires in part that control of all tools, equipment, materials and supplies be maintained to prevent the inadvertent inclusion of deleterious materials or objects in critical systems.

Contrary to the above, the inspector noted during a plant tour that:

- a. Paper, cigarette butts and a metal table were found inside the 125V and 250V Battery Rooms in the 710 elevation.
- b. Oil soak rags, paper, glass jars and pop cans were found in the 1A, 1B, and O Emergency Diesel Generator Rooms including the inside of the energized cabinets.
- c. An open paint can was found in the emergency diesel generator cable tray 156A1GP.

Corrective Action and Results Achieved

A cleanup crew was alerted to the specific items found in the inspection. The items were immediately removed.

Corrective Action to Avoid Further Non-Compliance

The Edison Field Engineer, the Contractor Superintendent in charge of painting, the Station Master Electrician and the Technical Staff Supervisor were informed on the non-compliance and reminded that Battery rooms are not to be used for storage purposes.

A letter signed by the Site Construction Superintendent was distributed the day after the identified noncompliance, concerning the proper use of flammable liquids.

Those areas still under construction are periodically inspected in accordance with Project Procedure 81-2. Those areas turned over to the Production Department are periodically inspected in accordance with the appropriate administrative procedures.

On April 9, 1982, the Project Manager for LaSalle County Station issued a directive to all site personnel. The purpose of the directive was to inform all personnel that Unit One fuel load was approaching and an individual effort by all was required to upgrade the 'mind set' to one of plant operation rather than construction. One area specifically highlighted in the directive was station housekeeping.

Date of Full Compliance

Full compliance has been achieved.

Item of Apparent Noncompliance

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.

Commonwealth Edison Company Assurance Manual, 14-51B, Item 3C, states in part: "...attach...out of service cards at all isolation points, as required by station procedures, to item (or items) taken out of service."

LaSalle County Station Equipment Out of Service Procedure, LAP 900-4, F.l.f. and Construction Instruction No. 1-2-G-1 states the supervisor in charge of the work "has the responsibility to assure that...out of service cards have been placed correctly and that the equipment is safe to work on."

Contrary to the above, February 17, 1982, the RHR Shutdown Cooling Outboard Isolation Valve 1E12-F008 was disassembled with that section of the system not properly tagged out. This resulted in the discharge of approximately 5,000 gallons of reactor water into the Reactor Building.

Corrective Action and Results Achieved

The Equipment Outage Checklist for the work on the 1E12-F008 was reviewed following the incident. The RHR Shutdown Cooling Inboard Suction Isolation Valve 1E12-F009, a necessary isolation point for the work being performed on valve 1E12-F008, was added to the Outage Checklist prior to further work being performed.

Corrective Action to Avoid Further Non-Compliance

1. Shift supervisors have been instructed to accept only written outage requests (form LAP 900-4, Attachment B) except in emergency.
2. The Out of Service procedure has been reviewed with the Construction Crafts, with special emphasis on the following:
 - a. Construction Crafts are not to begin work on a job until specifically instructed to do so by the CECO. "supervisor in charge of the work" or his designee after he has verified proper outage isolation.
 - b. Construction Crafts are not to work on any valves which are tagged as isolation points with an out of service card.

3. This incident was reviewed with the operating supervisors, nuclear station operators, equipment operators, and equipment attendants on all six shift crews, with emphasis on the factors contributing to the incident.
4. A directive was issued by the LaSalle County Station Project Manager to all site personnel concerning 'Conduct of Operations'. In the directive all personnel were advised that LaSalle is to be considered an operating plant and identified several areas where a more operationally oriented attitude is required to avoid interface problems. One of the specific areas emphasized was the Out of Service Procedure.

Date of Full Compliance

Full compliance has been achieved for all of the corrective actions listed above.

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