



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

April 4, 1983

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 Units 1 and 2
Response to Inspection Report Nos.
50-373/82-55 and 50-374/82-33
NRC Docket Nos. 50-373 and 50-374

Reference (a): C. E. Norelius letter to Cordell
Reed dated February 23, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. W. G. Guldemon and A. L. Madison on December 1-31, 1983, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. An extension of the due date for our response was discussed with Mr. W. G. Guldemon on March 22, 1983. This extension was verified with Mr. R. D. Walker of your office. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

In Reference (a), two areas were identified which required further responses: the possible broad implications of problems with administrative controls over equipment and plant operations, and timely response to abnormal conditions. A detailed response to these two items is also provided 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.

APR 6 1983

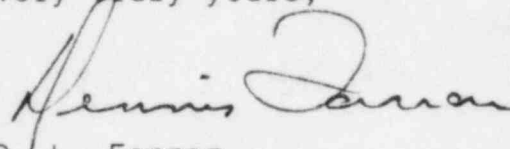
J. G. Keppler

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If you have any further questions on this matter, please direct them to this office.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Dennis J. Farrar". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

D. L. Farrar
Director of Nuclear Licensing

CWS

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

6247N

RESPONSE TO NOTICE OF VIOLATION

INSPECTION REPORT NOS.

50-373/82-55 and 50-374/82-33

Item of Noncompliance

Technical Specification 6.2, "Plant Operating Procedures and Programs," requires in part, "Detailed written procedures including applicable checkoff lists covering items listed below shall be...adhered to... The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978... Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, lists equipment control and log entries, record retention, and review procedures under recommended administrative procedures. LaSalle Administrative Procedure (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," states in part "The Shift Engineer reviews the temporary system change, assigns a number and authorizes initiation of the change . . ." LAP 200-3, "Shift Change," states in part "The off-going Shift Engineer shall...log in the Shift Engineer's log any equipment or surveillance which is in a degraded mode and/or may require further action."

Contrary to the above requirements, the high voltage power supply cable to the "B" Intermediate Range Monitor was left disconnected prior to a reactor startup performed on December 19, 1982, without the condition being controlled as a temporary system change under LAP 240-6 and without any entries being made in the Shift Engineer's log to identify this situation in accordance with LAP 200-3.

Response

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

Upon discovering the "B" IRM High Voltage Cable disconnected, operations immediately suspended startup. The cable was reconnected, and IRM "B" was placed in BYPASS. The discovery of the disconnected cable and subsequent degraded condition of IRM "B" was entered in the Shift Engineer's Log. Training tailgates were given per night orders stressing to all crews the importance of adhering to procedures regarding authorization of lifted leads (LAP 240-6) and maintenance of logs as required during turnover (LAP 200-3).

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

An On Site Review (#83-10) was conducted on 3-16-83 and included a discussion of the possible broad implications of this noncompliance. The On Site Review concluded the following:

- 1) An effort to sensitize applicable Maintenance and Operations personnel to the importance of adhering to LAP 240-6, as exemplified by the "B" IRM event will be conducted by Station Management.
- 2) The required content of NSO and Shift Engineer's Logs, as described by Station Procedures shall be reviewed by Operations Staff. Procedure revisions and/or operator retraining will be performed as deemed appropriate by this review.

DATE OF FULL COMPLIANCE

Full compliance was achieved on December 19, 1982. Follow-up action as the result of the station On Site Review of the potentially broad implications of this and other NRC concerns will be completed by May 13, 1983.

NRC Concern #1

"In addition to the item of noncompliance, two events occurred during the inspection period which, except for fortuitous circumstances, would also have resulted in items of noncompliance. The first item, detailed in Paragraph 3, involved a situation in which an abnormal indication was not identified in a timely fashion even though sufficient information was available. This topic has been the subject of several discussions between our staffs including a Management Meeting conducted in our offices on June 11, 1982. You are requested to evaluate the adequacy of the level of management attention in this area and to provide the results of the evaluation in your response to this letter.

Response

An extensive review of all concern expressed in the inspection report as well as all previous items of noncompliance were reviewed to determine if additional action was required. The review identified several areas where improvements could be made, including re-evaluation of the Degraded Equipment Log procedure, Shift Engineer Log entries and identification of equipment which has had maintenance performed during an outage. The re-evaluation of these topics will be completed by May 1, 1983.

In an effort to ensure operating shift sensitivity to the concerns expressed in the inspection report, Tailgate Training Sessions will be conducted with each operating crew.

Additionally, a formal On Site Review of operations activities in the areas of equipment control and response to abnormal conditions will be conducted again no later than April 22, 1983, to assure that the proper level of management attention has been directed to the areas of concern.

NRC Concern #2

The second event, detailed in Paragraph 4, concerns instrument calibration control. In November 1982 the inspectors identified to station management a concern about the possibility of Technical Specification-related items being on the non-Technical Specification-related past due for calibration list. Little effort was made by the station to verify that this was not the case. As noted in Paragraph 4, an example bearing out the concern was subsequently identified by the inspectors on December 21, 1982. The lack of a timely response by the station which should have identified and corrected the example is of concern to us. You are requested to address this concern in your response to this letter.

Response

Relative to the second concern expressed in your letter of February 23, 1983, the licensee understands how the inspector might have perceived that our response to his concerns was not timely.

A detailed review of the sequence of events leading to this concern (listed below) has been conducted. In retrospect, it could be concluded, based on this chronology, that the licensee was unresponsive to the inspector's concerns. This was NOT the case. It is our belief that this problem was the result of less than adequate communications between the inspector and the licensee. Improved communications could have precluded this issue from becoming a major concern. Measures have been implemented to improve this vital communications link, including increased documentation and dissemination of information discussed with the Resident Inspector. It is expected that similar areas of concern will be minimized in the future.

1. November 18, 1982 - The Resident Inspector identified several LPCS and RCIC instruments for which he questioned the current calibration status. His questions were immediately resolved by the Unit 1 Operating Engineer and Instrument Maintenance Department personnel by either recalibration or documentation of current calibration. All of the instrument in question were subsequently determined by the Resident Inspector to have no impact on system operability.
2. November 22, 1982 - The Station Superintendent met with the Instrument Maintenance Department surveillance coordinator and the staff assistant to review the general length and content of the overdue-for-calibration list. This review was cursory in scope and identified no instruments of safety or major operational significance with overdue calibrations. At this point in time, the deficiencies identified on November 18, 1982, were believed to have been adequately resolved, and were considered anomalies, rather than indications of a generic problem.

3. December 3, 1982 - Exit interview conducted addressing items 1 and 2. The Resident Inspector stated that he was continuing to investigate this area. None of the CECO employees contacted with regards to this issue or at the exit interview perceived that the Resident Inspector regarded this as an item of major concern at this time.
4. December 21, 1982 - The Resident Inspectors provided a list of several instruments for which they had questions concerning the current calibration status to one of the Instrument Maintenance Foremen.
5. December 23, 1982 - The Resident Inspector determined that all of the instruments questioned in Item 4 had current calibration with the exception of some temperature monitors in the Auxiliary Equipment Room. These were interpreted by the Resident Inspector to render the area temperature monitoring for the Auxiliary Equipment Room inoperable. These instruments were recalibrated the same day after the Resident Inspector notified the Operating Assistant Superintendent that the unit had entered a Technical Specification action statement. These instruments were subsequently determined to be within the twenty-five percent grace period allowed for Technical Specification surveillance frequencies.
6. January 3, 1983 - Exit interview was conducted addressing Items 4 and 5. The Resident Inspector expressed a serious concern with our lack of action in response to this issue. This was the first indication noted by the licensee that this issue represented a major concern to the Resident Inspector. The licensee advised that a detailed review of the overdue-for-calibration list had been initiated following the event described in Item 5, but that more information relative to the scope, magnitude and progress of the review was necessary to allow determination of a completion date.
7. January 4, 1983 - A meeting was held between the Station Superintendent, the Administrative and Support Services Assistant Superintendent, and members of the Instrument Maintenance Department to review this issue. The meeting resulted in changes to the surveillance program content and software to make it a more usable tool, and a comprehensive review of all instruments utilized to satisfy Technical Specification requirements to ensure that the calibration requirements were properly identified.
8. January 19, 1983 - CECO received the November inspection report addressing Items 1, 2, and 3. The report did not identify major concerns relative to our response to this issue.

9. February 1, 1983 - January exit interview was conducted. The Resident Inspector expressed concern that he had been unable to obtain a commitment for resolution of this issue. An April 1, 1983, commitment was provided the same day, following the exit interview.
10. February 23, 1983 - CECO received the December inspection report addressing Items 4, 5, and 6 requesting a response to a concern relative to lack of timely action to resolve this issue. CECO had no prior knowledge that the cover letter for this report would request a response of this nature.