



Commonwealth Edison

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April 12, 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 No. 50-373/81-44
NRC Docket No. 50-373

Reference (a): C. E. Norelius letter to Cordell
Reed dated March 15, 1982.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. I. T. Yin on December 22, 23, 29, 30, 1981, and January 7, 14, 27, 28, and 29, 1982 of activities at LaSalle County 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 upon my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

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

Very truly yours,

L. O. DelGeorge
L. O. DelGeorge

Director of Nuclear Licensing

lm
Enclosure

cc: NRC Resident Inspector - LSCS

SUBSCRIBED and SWORN to
before me this 12TH day
of April, 1982

[Signature]
Notary Public

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Response to Item Of Non-Compliance - I.E. Report 373/81-44

Non-Compliance 373/81-44-01

10 CFR 50, Appendix B, Criterion III, states, in part that, "measures shall be established to assure that applicable....design basis....for those structures, systems, and components....are correctly translated into....drawings..."

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations", Revision 15, dated January 2, 1981, states in Section 3, "The fundamental vehicle for design control involves multi-level review and/or evaluation of design documents by individuals or groups other than the original designer or designer's immediate supervisor whose authority and responsibility are identified and controlled by written procedures." "These design evaluations or reviews are conducted to written procedures and include consideration of quality standards, quality assurance requirements, materials suitability, process suitability, interface control and suitability of analytical or testing requirements as appropriate.", and "Responsibility for overall design and design control of mechanical, electrical, structural and nuclear related systems and components and compliance of responsibilities to Section III of the ASME Code is assigned to Project Engineering during the initial design and construction and to the Station Nuclear Engineering Department after plant start-up. Quality Assurance shall assure that design control requirements are fulfilled through review and audit."

Contrary to the above, the licensee's control over the A-E's suspension system design, including the proper selection of required snubbers, was inadequate in that rigid restraints were installed in close proximity with the mechanical snubbers. The snubbers were made inoperable by restricting the minimum snubber travel required to initiation unit lock-up. Restricting the snubber's travel could cause an increase in the design loads at the affected rigid restraints.

Corrective Action Taken and Results Achieved

All of the LaSalle Unit 1 Sargent & Lundy designed snubber installations have been reviewed to identify and eliminate any that are unnecessary from a thermal expansion viewpoint. This Corrective Action will resolve the issues raised by the NRC because the locations of small thermal deflections in the piping are characteristic of those regions that are also rigidly restrained.

Engineering Change Notices have been issued for each of the 397 snubbers with thermal movements of 1/16" and less. These ECN's either eliminate the snubber or replace it with a rigid restraint. Only three (3) snubbers remain to be changed to struts as directed by the Engineering Change Notices. All other snubbers required for Unit 1 have been changed to struts or eliminated as directed. The remaining 3 will be completed after fuel load as they require installation of the Reactor Pressure Vessel head and Drywell dome.

Corrective Action Taken to Avoid Further Non-Compliance

The Sargent & Lundy EMD Training Procedures (EMD-TP-1 and EMD-TP-3) are being revised to prevent the recurrence of this problem. The revisions being made include the following restrictions:

- a) No thermal analysis will be performed for subsystems with normal operating temperatures of 150°F or less. Accordingly, no snubbers will be used in these subsystems.
- b) No snubbers will be used for thermal movements of 1/16" or less.
- c) The use of snubbers for thermal movements between 1/16" and 1/8" will be limited. A new criteria based on the size and configuration of the piping and on the proximity of the snubber to equipment, anchors and branch lines has been established.

Date of Full Compliance

The remaining 3 snubber changeouts will be done prior to the first critical with the Reactor and Drywell heads in place. The Training Procedures will be revised and training implemented by April 15, 1982. The new criteria for thermal movements between 1/16" and 1/8" has been established.