



Commonwealth Edison
LaSalle County Nuclear Station
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July 1, 1994

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Response to Weaknesses Identified in Inspection Report Nos. 50-373(374)/94006
NRC Docket Numbers 50-373 and 50-374

- References:
1. John A. Grobe letter to W. P. Murphy, Dated May 17, 1994, Transmitting NRC Inspection Report Nos. 50-373(374)/94006.
 2. Attachment B of W. P. Murphy letter to Document Control, Dated April 1, 1994, Transmitting a Response to Notice of Violation from NRC Inspection Report Nos. 50-373(374)/93035 and Additional Information Concerning Programmatic Improvements at LaSalle.
 3. W. P. Murphy letter to James Lieberman, Dated May 13, 1994, Transmitting LaSalle County Station's Response to Notice of Violation and Civil Penalty Concerning LaSalle's Corrective Actions Program as Identified in NRC Inspection Report Nos. 50-373(374)/93031; 50-373(374)/93036 and 50-373(374)/93040.

Reference 1 requested a response to weaknesses identified during events involving the introduction of foreign material into the Unit 2 Turbine Lube Oil system. The initial technical and security evaluation of the incident was considered weak, especially with respect to timeliness and quality of the evaluation. I would like to summarize some of the actions we have taken, or will take, to improve our performance in event investigations.

The LaSalle Operations Duty Officers have been provided with instructions to contact station senior management personnel to inform them of events which have the appearance of tampering or willful misconduct. Station senior management will designate personnel to be involved in the initial investigation phases of these types of events. By lowering management's threshold for taking action when potentially significant problems arise, aggressive and timely investigations will be accomplished.

In February 1994, we upgraded our corrective action process to include a review of events by senior management. Problem events, as reported on the Problem Identification Form (PIF), are reviewed during the daily Event Screening Meeting by senior managers. Senior management takes an active role in the screening and evaluation of events so that proper emphasis and problem ownership may be assigned on a timely basis. If tampering is suspected, the Security Staff will be immediately notified and brought into the investigation.

The Security Staff will be responsible for making an initial assessment of the incident utilizing LaSalle Administrative Procedure (LAP)-100-26, Special Investigation Guideline. This procedure is being revised to provide clearer guidance on the performance of investigations of events which may involve tampering. This procedure will include required personnel notifications, definition of investigative team members, and appropriate conduct of the investigation. Input from ComEd and industry experts is being utilized in developing this procedure. The revisions will be completed by October 1, 1994.

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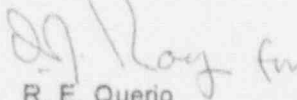
We recognized the importance of our personnel understanding the threat that tampering poses to operation of a nuclear power plant. The Turbine Lube Oil event was communicated to station personnel as a part of the "Kickoff Meetings" for the recently completed Unit 1 refueling outage. As a part of his address, the Station Manager's points of emphasis included identification of rules and procedures which apply, personnel safety issues associated with these actions, and station management's resolve to take swift disciplinary action, including termination, for willful acts of wrong-doing. A station memorandum, issued by the LaSalle Site Vice President, was distributed to station personnel reiterating these points. On March 25, 1994, the LaSalle Station Manager discussed the seriousness of willful acts of wrong-doing with the Event Screening Committee. He emphasized the importance of taking aggressive action when intentional acts may be involved.

Some of the issues identified in the report, including timeliness of investigation initiation and completion, are associated specifically with LaSalle's Corrective Actions Program. These events occurred approximately six to nine months ago. Since that time, LaSalle has undergone extensive changes, including changes in the implementation of our Corrective Actions Program. Programmatic improvements that we have made or will make in the near future are summarized in References 2 and 3 above.

Let me assure you that we understand the seriousness that tampering poses to the safe and efficient operation of a nuclear power station. The improvements we have made in our Corrective Actions Program, the revisions that we will make to LAP-100-26, and personnel awareness of the seriousness of tampering at a nuclear power station, will provide the means for carrying out timely, thorough investigations. We will make all efforts to promptly identify, thoroughly investigate, identify the root cause, and take swift action as appropriate.

If there are any questions or comments concerning this letter, please refer them to me at (815) 357-6761, extension 3600.

Respectfully


R. E. Querio
Site Vice President
LaSalle County Station

cc: J. B. Martin, Regional Administrator, Region III
A. T. Gody Jr., Project Manager, NRR
D. E. Hills, Senior Resident Inspector, LaSalle
D. L. Farrar, Nuclear Regulatory Services Manager, NORS
J. E. Lockwood, Regulatory Assurance Supervisor, LaSalle