



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 15, 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Response to Notice of Violation and Open Item
Inspection Report Nos. 50-373/91009; 50-374/91008
NRC Docket Nos. 50-373 and 50-374

Reference: E.G. Greenman letter to Cordell Reed dated
June 14, 1991 transmitting NRC Inspection
Report 50-373/91009; 50-374/91008

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Notice of Violation (NOV) and Open Item. The NOV cited one Severity Level IV violation. The violation concerned the improper surveillance for assessment of oxygen in the suppression pool. The Open Item from a previous inspection report identified examples of insufficient explanations provided for 10 CFR 50.59 reviews. The violation response is provided in Attachment A and the Open Item response is Attachment B.

CECo understands the significance of these events as well as the need for effective corrective actions to prevent recurrence. These have been considered in developing actions in response to the cited violation and the open item.

if your staff has any questions or comments concerning this letter, please refer them to Annette Denenberg, Compliance Engineer at (708) 515-7352.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

GAD/TJK/GMP

Enclosure

cc: A.B. Davis, Regional Administrator - RIII
B. Siegel, Project Manager - NRR
T. Tongue, Senior Resident Inspector

1000 ZNLD/1052/1

9107190213 910715
PDR ADOCK 05000373
PDR

IE01
1/1

ATTACHMENT A
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 373/91009; 374/91008

VIOLATION (373/91009-01; 374/91008-01)

Technical Specification Surveillance requirement 4.6.6.2 requires sampling of the drywell and suppression chamber within 24 hours after thermal power is greater than 15% and at least once per 7 days thereafter to verify that oxygen concentration is less than or equal to 4% by volume as required by Technical Specification 3.6.6.2 while in Operational Condition 1.

Contrary to the above, the suppression chamber was not sampled within 24 hours after thermal power reached 15% and was not sampled at least once per 7 days as required by Technical Specification 3.6.6.2 since initial operation in 1982 to April 1991 due to an inadequate surveillance procedure LOS-AA-W1, "Technical Specification Surveillances", that only required sampling of the drywell.

This is a Security Level IV Violation (supplement I)

REASON FOR THE VIOLATION

The apparent cause of this event was an inadequate review to determine the effects of the Technical Specification change on the applicable Station procedures.

On April 10, 1991 it was determined that LaSalle had not performed Technical Specification Surveillance Requirement 4.6.6.2 for the suppression chamber oxygen concentration. The error for this missed surveillance has been traced back to the original licensing of LaSalle.

During the Pre-Licensing Technical Specification approval period in 1981, the "Proof and Review" copy of Technical Specification 3/4.6.6.2 which was submitted by the Station employed the term "Primary Containment". However, the "Proof and Review" copy of Technical Specification 3/4.6.6.2 which was subsequently returned to the Station following NRC review had the words "Drywell and Suppression Chamber" in place of the term "Primary Containment". During Station review of the Technical Specification, the wording change apparently was viewed to be editorial in nature, since the "Primary Containment" consists of the drywell and the suppression chamber and it was interpreted that sampling the drywell met the Surveillance Requirement of sampling the "Primary Containment". Therefore the procedure that addresses this Surveillance Requirement was not changed to reflect the new wording.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

LOS-AA-W1, "Technical Specification Weekly Surveillances", was revised to require checking the drywell and suppression chamber. This procedure was approved for use on April 9, 1991.

The procedures for unit startups (e.g. LGP-1-1, "Normal Unit Startup"; LGP-1-2, "Unit Startup to Hot Standby"; and LGP-1-3, "Unit Startup from Hot Standby to Power Operation") are also being revised to require checking both the drywell and suppression chamber oxygen concentrations within 24 hours after reaching 15% of rated thermal power. These revisions are scheduled for completion by July 31, 1991 and will be implemented during subsequent unit startups.

CORRECTIVE ACTIONS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

LAP-1200-12, "Operating License Technical Specification Changes", (Revision 1, dated 1987), was reviewed and it was determined that this version of the procedure provides more detailed guidance for preparing and processing Technical Specification changes than in the past. It is believed that the level of detail currently provided will preclude similar occurrences.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance is expected to be achieved by July 31, 1991 when the unit startup procedures are revised.

ATTACHMENT B
RESPONSE TO OPEN ITEM
INSPECTION REPORT 373/91009; 374/91008

OPEN ITEM NO. 373/91002-02

CECo agrees that although the technical aspects of the identified safety evaluation conclusions were correct, there were concerns regarding the extent of documentation for those conclusions.

Considerable efforts have been in progress at both site and Corporate levels to upgrade the quality of the evaluation process through improved training and by enhancement of the site procedure. These efforts are continuing as the site implements CFCo Corporate Directive NOD-TS.11, "10 CFR 50.59 Safety Evaluation Process".

LaSalle's past practice of performing safety evaluations, in conjunction with the format of the (existing) procedure had resulted in a "checklist" approach. Although an adequate review of potential unreviewed safety questions was addressed, this approach often did not produce documentation that reflected the considerable background knowledge of the persons preparing and reviewing the safety evaluations, nor the considerations given to the evaluation. Such considerations include ensuring that the documents and references that formed the bases for the conclusions were recorded or documented on the safety evaluation form.

The objectives of the training program and procedure revisions currently in progress are to:

- 1) Strengthen the procedure by providing better guidance for answering the questions. The end objective of this additional guidance is to improve documentation. Overall, the quality of the safety evaluations will be increased.
- 2) Improve the technical and regulatory background knowledge of safety evaluation preparers and reviewers through increased training. Several training courses have been given at LaSalle on a developmental basis, with one course scheduled for wide spread implementation on site. Training of the safety evaluation reviewers is scheduled for completion by October 1991 and training of the safety evaluation preparers is scheduled for completion by April 1992.

Finally, CECo is working within the industry to improve the safety evaluation process. LaSalle personnel are participating in an EPRI project to utilize an "Artificial Intelligence - Expert System" for the conduct of safety evaluations. This project (termed "SARA" for Safety Analysis Review Advisor) is scheduled for user software testing during August 1991 at LaSalle. The system guides users through safety evaluations and automatically provides documentation by tracking the question and answer process. LaSalle believes that the experience gained during the testing will, in itself, provide an increased understanding of completeness and documentation required for adequate safety evaluations. Following the testing phase of this software, an evaluation will be made to determine if SARA has been beneficial and how to incorporate the results of the testing.