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LaSalle County Nuclear Station
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October 27, 1994

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-373/94016; 50-374/94016
NRC Docket Numbers 50-373 and 50-374.

Reference: 1. E. G. Greenman letter to R.E. Querio,
Dated September 27, 1994, Transmitting
NRC Inspection Report 50-373/94016; 50-374/94016.

Enclosed is Commonwealth Edison Company's response to the Notices of Violation (NOV) that were transmitted with the Reference 1 letter and NRC Inspection Report Nos. 50-373/94016; 50-374/94016.

Reference 1 identified three violations concerning radiological controls and environmental monitoring. Failure of station personnel to follow station procedures and a lack of teamwork were the predominant causal factors in these events. In all instances, the root cause investigations revealed that station personnel did not follow station or corporate procedures. I have stressed, and will continue to stress to all site personnel, my utmost concern for procedural adherence at LaSalle County Station. These violations underscore the fact that LaSalle County Station personnel have not been successful in developing the appropriate radiological culture, values and attitude. The lack of supervisory expectations and overview has resulted in inconsistent compliance with radiological practices and procedures. LaSalle County Station is determined to establish and maintain a culture that demonstrates the appropriate regard for procedural compliance and understands the need for self assessment of the broader issues.

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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
W. D. Reckley, Project Manager, NRR
P. G. Brochman, Senior Resident Inspector, LaSalle
D. L. Farrar, Nuclear Regulatory Services Manager, NORS
Central file

**ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-373/94016, 50-374/94016**

During an NRC inspection conducted on July 9 through August 19, 1994, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

VIOLATION: 373(374)/94016-03(a,b)

Technical Specification 6.2.B requires, in part, that radiation protection procedures be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Procedure LRP 1200-1 "Airborne Releases, 10 CFR 50 Appendix I Design Objectives," requires that only particulates with half-lives exceeding eight days be included in reports of gaseous activity released. Attachment B, "Completion of ODCM Worksheet," to this procedure, step 1.b, requires that the total release be calculated as the release rate times the release duration.

Procedure LRP 1820-28, "Calibration and Periodic Performance Check of the Eberline SPING-3B High Range Noble Gas Monitor (SA-9)," requires verification that the check source is within the acceptance criteria shown on Attachment E.

Contrary to the above:

1. In reports from 1993 and 1994 for gaseous activity released from 1993 through July 14, 1994, the licensee incorrectly included particulates with half-lives less than eight days in calculating dose contributions and used improper release durations.
2. On June 10, 1994, a check source was not verified to be within the acceptance criteria when it was incorrectly recorded as acceptable during a performance check of the Eberline SPING-3B monitor.

This is a Severity Level IV violation (Supplement IV)

VIOLATION: 373(374)/94016-04

Technical Specification 6.2(A)(1) requires that written procedures be established, implemented, and maintained concerning the recommended procedures in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. Step 1(d) of Appendix A to RG 1.33, Revision 2, February 1978, recommends administrative procedures concerning procedure adherence and temporary change methods.

Procedure LAP 100-40, "Procedure Use and Adherence Expectations," Revision 5, step F.2.b.1, requires that only current revisions of procedures be used.

Procedure LAP 810-10, "Reproduction of Controlled Documents," Revision 9, step F.1, requires reproductions of controlled documents to have a 30-day date stamp or a "For Reference Only Void After (fill in date)" stamp.

Contrary to the above:

1. From May 25, 1993, through July 14, 1994, a health physicist used procedures LYP 1200-1, "Airborne Releases-10 CFR 50 Appendix I Design Objectives," and 1300-1, "Offsite Dose Calculations for Containment Purge," but not the current revisions.
2. On July 10 and July 14, 1994, a health physicist used a reproduction of procedure 1820-28, "Calibration and Periodic Performance Check of the Eberline SPING- 3B High Range Noble Gas Monitor (SA-9)," that did not have a required stamp.

This is a Severity Level IV violation (Supplement I).

VIOLATION: 373(374)/94016-08

Technical Specification 6.2.F.5 requires, in part, that a program be implemented to monitor, sample, and analyze for radionuclides in the environment.

Procedure CEPIP 1031-02, "Calibration of Air Sampler Equipment and Rotameter," Revision 0, dated July 1993, as part of the program to ensure the accuracy of the sampling and analysis, requires that field calibrations of air sampling equipment be performed monthly.

Contrary to the above, on August 10, 1994, procedure CEPIP 1031-02 had not been implemented since July 1, 1994, for all 14 of the environmental air sampling stations.

This is a Severity Level IV violation (Supplement IV).

ATTACHMENT (Continued)
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-373/94016, 50-374/94016

REASON FOR VIOLATION: 373(374)/ 94016-03a

On July 7, 1994, during the performance of an NRC inspection of the Semi - Annual Effluents Reports, a NRC Inspector noted that the calculations of released gaseous activities were a factor of 10 higher in 1993 than in the previous years 1991 and 1992. The reason for this increase was determined to be that the ODCM specialist did not conduct the off - site dose calculations in accordance with procedure LYP 1200-1, "Airborne Releases, 10 CFR 50 Appendix 1 Design Objectives." Cumulative dose contributions from Noble Gases, Iodine 131, Iodine 133, Tritium, and radionuclides in particulate form with half lives greater than 8 days shall be determined in accordance with the ODCM (Off-Site Dose Calculation Manual) at least once per 31 days for the current calendar quarter and current calendar year. Attachment B of the same procedure (LYP 1200-1) states that "if multiple Tritium samples from one system are taken, use the highest value." Review of the 1993 Semi-Annual Effluent Reports showed inclusion of particulate nuclides with half lives less than eight days and the summation of multiple tritium samples from the same sample period(weekly). This resulted in erroneous values and thus the maximum dose to the public resulting from releases in 1993 was over reported.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED
(373(374)/94016-03a):

The ODCM Specialist has reviewed LAP 100-40, "Procedure Use and Adherence Expectations."

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS
(373(374)/94016-03a):

Procedure LYP 1200-1, "Airborne Releases, 10 CFR 50 Appendix 1 Design Objectives." has been submitted for revision to correct the weak procedural instructions.

Radiation Protection Supervision will conduct an independent review of the monthly ODCM calculations performed by the ODCM Specialist.

ATTACHMENT (Continued)
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
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DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (373(374)/94016-03a):

Full compliance was achieved on October 25, 1994 when the Errata sheets correcting the 1993 Semi-Annual Effluent Reports were submitted to the U.S. Nuclear Regulatory Commission.

ATTACHMENT (Continued)
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-373/94016, 50-374/94016

REASON FOR VIOLATION: 373(374)/ 94016-03b

On July 14, 1994, during the performance of an NRC inspection of the Radwaste Program, a NRC Inspector noted that the check source response entered on Attachment E of LRP 1820-28, " Calibration and Periodic Performance Check of the Eberline SPING-3B High Range Noble Gas Monitor(SA-9)", was incorrectly entered as acceptable. As a result, a required review (per LRP 1820-28) by the RP supervisor (if the check source was found unacceptable) was not performed. Additionally, this error was not caught because the Attachment E allowed for 18 weeks of data to be collected before the form would need to be submitted for review.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED
(373(374)/94016-03b):

Upon this discovery, the 786' Auxiliary Building Particulate, Iodine, Noble Gas (PING) 3B monitor was source checked and verified to be operable, as part of the weekly surveillance requirements.

Procedure LRP 1820-28 was revised on July 29, 1994 to require that an RP supervisor verify source check acceptability weekly and record this on Attachment E of this procedure.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS
(373(374)/94016-03a):

The performance check of the Particulate, Iodine, Noble Gas (PING) 3B monitor has been added to the Radiation Protection Technician's weekly surveillance. This source check will now be performed by the Radiation Protection Technicians and then reviewed weekly by Radiation Protection Supervision.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (373(374)/94016-03b):

Full compliance was achieved on July 14, 1994 when the weekly source check of the 786' Auxiliary Building Particulate, Iodine, Noble Gas (PING) 3B monitor was completed.

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RESPONSE TO NOTICE OF VIOLATION
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50-373/94016, 50-374/94016

REASON FOR VIOLATION: 373(374)/ 94016-04

During the performance of a NRC inspection of the Radwaste Program, a NRC Inspector noted that copies of procedures used to perform in plant activities were not date stamped per procedure LAP 810-10, "Reproduction of Controlled Documents", nor were they current revisions as required by LAP 100-40, "Procedure Use and Adherence." The procedures in question (LYP's used for ODCM functions) govern the LaSalle County Station gaseous effluent discharges and the associated dose to the public. The inspector identified that reproductions of procedures LYP 1200-1 and 1300-1, pertaining to Offsite dose calculations, were not current revisions (per LAP 100-40) and that these procedures and procedure LRP 1820-28 (see Subsection 4.2.1(b)), although current, did not have an appropriate date stamp. These procedural reproductions were improperly used by a Health Physicist from May 25, 1993 through July 14, 1994.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED
(373(374)/940163-04):

The procedure reproductions in question were included in a folder along with miscellaneous ODCM data. These superseded procedures were removed from the folder and discarded.

The ODCM Specialist has reviewed LAP 100-40, "Procedure Use and Adherence Expectations

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS
(373(374)/94016-04):

A notice has been placed on the cover of the folder used in the performance of the ODCM Worksheet which states, "Use only current procedures and Attachments."

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (373(374)/94016-04):

Full compliance was achieved immediately following discovery by the NRC Inspector. The current revisions were obtained from Central Files and properly date stamped, and the superseded procedures were discarded. The surveillances were re-verified using the current procedures and no deficiencies were found.

ATTACHMENT (Continued)
RESPONSE TO NOTICE OF VIOLATION
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REASON FOR VIOLATION: 373(374)/ 94016-08

On August 10, 1994, during the performance of an NRC inspection of the Radiological Environmental Monitoring Program (REMP), it was discovered that the monthly calibration of the environmental field sampling equipment had not been performed. Calibration of the environmental field sampling equipment is required to be performed at least once per 31 days, in accordance with Corporate Emergency Plan Implementing Procedure (CEPIP) 1031-02 "Calibration of Air Sampler Equipment and Rotameter". This calibration is contracted out to a vendor, who supplies the station with a schedule of calibrations on a periodic basis. The previous calibrations had been performed on July 1, 1994.

The root cause for this violation is that LaSalle County Station personnel had no positive method to verify that the samples and calibrations were performed in the specified time frames. Sufficient vendor training was not conducted on the importance of completing the sample collection and calibrations in a timely fashion. If the training had better explained these consequences, this event might not have occurred.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED
(373(374)/94016-08):

Upon the discovery that the calibrations had not been performed, the vendor was contacted and the calibrations of the air sampler equipment and rotameters were performed and completed on August 11, 1994.

Training of the vendor sample collectors was conducted on September 24, 1994. The importance of collecting all samples and performing all calibrations in the required time frame was also explained.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS
(373(374)/94016-08):

The vendor is supplying LaSalle County Station with a current list of all air sampler equipment and rotameter calibration due dates. The EP Coordinator is responsible for reviewing this list to ensure that the new due dates do not exceed the ODCM surveillance time frame. The vendor sample collector will also notify the EP coordinator, via fax or phone call,

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the day the air sampler equipment and rotameter calibrations are done. The EP Coordinator will contact the sample collector if the coordinator has not heard that the air sampler equipment and rotameter calibrations have been done on their scheduled due dates.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (373(374)/94016-08):

Full compliance was achieved on August 11, 1994 when all air sampler equipment and rotameter calibrations were performed.