



Commonwealth Edison
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January 5, 1984

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road - Region III
Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report Nos.
50-373/83-42 and 50-374/83-46
NRC Docket Nos. 50-373 and 50-374

Reference (a): W. D. Shafer letter to Cordell Reed
dated December 6, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. W. G. Guldemon and S. G. Guthrie on October 11 through November 18, 1983, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. Reference (a) indicated that adequate corrective action had been taken for Items 1 and 2. Therefore, the Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure for Item 3 only.

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.

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

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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RESPONSE TO INSPECTION REPORT
NOS. 50-373/83-42 and 50-374/83-46

ITEM OF NONCOMPLIANCE

1. Technical Specification 3.8.1.1 states that in Operational Conditions 1, 2 and 3:

"As a minimum, the following A.C electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and
- b. Separate and independent diesel generators 0, 1A, 2A, and 1B with:
 - (1) For diesel generators 0, 1A and 2A:
 - (a) A separate day fuel tank containing a minimum of 250 gallons of fuel.
 - (b) A separate fuel storage system containing a minimum of 31,000 gallons of fuel.
 - (2) For diesel generator 1B, a separate fuel storage tank/day tank containing a minimum of 29,750 gallons of fuel.
 - (3) A separate fuel transfer pump."

Action Statement f of Technical Specification 3.8.1.1 states:

"With diesel generator 2A of the above required A.C electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C sources by performing Surveillance Requirements 4.8.1.1.1.a and 4.8.1.1.2.a.4, for diesel generator 1A, within one hour, and at least once per 8 hours thereafter; restore the inoperable diesel generator 2A to OPERABLE status within 72 hours or declare standby gas treatment system subsystem B, Unit 2 drywell and suppression chamber hydrogen recombiner system, and control room and auxiliary electric equipment room emergency filtration system train B inoperable and take the ACTION required by Specifications 3.6.5.3, 3.6.6.1, and 3.7.2."

Contrary to the above, on October 16, 1983, with Unit 1 in Operational Condition 1, the 2A diesel generator fuel transfer pump was rendered inoperable rendering the 2A diesel generator inoperable and the 1A diesel generator was not tested within 1 hour.

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

Response

NO RESPONSE REQUIRED.

ITEM OF NONCOMPLIANCE

2. Technical Specification 3.6.5.1 states that in Operational Conditions 1, 2, 3, and *, SECONDARY CONTAINMENT INTEGRITY shall be maintained. It further states,

"Without SECONDARY CONTAINMENT INTEGRITY:

- a. In OPERATIONAL CONDITIONS 1, 2, or 3, restore SECONDARY CONTAINMENT INTEGRITY within 4 hours or be in at least HOT SHUTDOWN with the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. In Operational Condition *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable."

Technical Specification 4.6.5.1 states in part,

"SECONDARY CONTAINMENT INTEGRITY shall be demonstrated by verifying at least once per 31 days that all secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic dampers secured in position."

Contrary to the above, on October 17, 1983, Secondary Containment Integrity was compromised by the removal of a valve access plate from the refueling floor. No compensatory actions were taken until October 24, 1983, when the condition was recognized and corrected. Further, the procedure for implementing the requirements of Technical Specification 4.6.5.1 did not include verification of the status of the valve access plate.

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

Response

NO RESPONSE REQUIRED

ITEM OF NONCOMPLIANCE

3. Technical Specification 3.8.1.1 requires in Operating Conditions 1, 2, and 3 that:

"As a minimum, the following A.C electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and
- b. Separate and independent diesel generators 0, 1A, 2A, and 1B with:
 - (1) For diesel generators 0, 1A, and 2A:
 - (a) A separate day fuel tank containing a minimum of 250 gallons of fuel.
 - (b) A separate fuel storage system containing a minimum of 31,000 gallons of fuel.
 - (2) For diesel generator 1B, a separate fuel storage tank/day tank containing a minimum of 29,750 gallons of fuel.
 - (3) A separate fuel transfer pump."

This specification further requires that, "With either one offsite circuit or diesel generators 0 or 1A of the above required A.C electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C sources by performing Surveillance Requirements 4.8.1.1.1.a within one hour, and 4.8.1.1.2.a.4, for one diesel generator at a time, within four hours, and at least once per 8 hours thereafter; restore at least two offsite circuits and diesel generators 0 and 1A to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours."

Contrary to the above, for approximately 20 hours on October 26 and 27, 1983, with Unit 1 in Operational Condition 2, one independent offsite circuit to the Unit 1 Class 1E distribution system was inoperable and the required tests were not performed.

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

Response

Corrective Action Taken and Results Achieved

Upon discovering the problem of not being able to supply the Unit 1 safety related busses from the Unit 2 UAT without the use of jumpers, a jumper was authorized and installed. This enabled the breaker circuit for the unit tie breakers to function as desired by bypassing the interlock feature of the bus tie breaker contacts.

Corrective Action Taken to Avoid Further Noncompliance

A procedure change to LaSalle Operating Procedure LOP-AP-01, Restoring the System Auxiliary Transformer 142(242) to service with the unit shutdown and LOP-AP-08 Removing System Auxiliary Transformer SAT 142(242) from service with Unit 1(2) in shutdown has been generated, and Action Item Record (AIR 01-83-67102) has been written to track their completion.

Training on this event (AIR 01-83-67101) will be conducted for all licensed operating personnel.

Date When Full Compliance Will Be Achieved

March 1, 1984.