



February 23, 1995

United States Nuclear Regulatory Commission
Washington, D. C. 10555

Attention: Document Control Desk

Subject: **Response to NRC Inspection Report No. 50-373/94017; 50-374/94017
LaSalle County Nuclear Station Units One and Two NRC Docket
Numbers 50-373 and 50-374
Corrective Actions in the Areas of Equipment Reliability and
Preventive Maintenance**

- References:
1. Response to NRC Inspection Reports 50-373/93026;
50-374/93026 and 50-373/93035; 50-374/93035 -- Attachment B,
dated April 1, 1994
 2. E. G. Greenman Letter to R. E. Querio, dated November 9,
1994, Transmitting NRC Inspection Report 50-373/94017; 50-
374/94017

Reference 1 provided a summary description of programmatic improvements being undertaken at LaSalle. Specifically, initiatives were described in the areas of Communication of Management Expectations, Issues Management, Engineering Approach to Generic NRC Communications, Equipment Materiel Condition, and Maintenance.

In Reference 2, a request was made to provide the projected schedule and current status of corrective actions relative to the areas of Equipment Reliability and Preventive Maintenance given in Sections E.2, F.4.a, and F.4.b of Reference 1.

The purpose of this letter is to provide the requested information pursuant to Reference 2. Attachments 1 and 2 to this letter address our recent actions concerning the improvement of Equipment Reliability and the Preventive Maintenance Program, respectively.

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Please refer questions or comments concerning this document to me at (815) 357-6761, extension 3600.

Respectfully,



Robert E. Querio
Site Vice President
LaSalle County Station

Attachments

cc: J. B. Martin, Regional Administrator, USNRC, Region III
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Station File

ATTACHMENT 1

FURTHER RESPONSE TO NRC INSPECTION REPORTS 50-373/93026; 50-374/93026 AND 50-373/93035; 50-374/93035

SECTION E.2 EQUIPMENT RELIABILITY

The LaSalle Station staff gave a presentation to the NRC Region III staff on November 10, 1994, relative to the role of Engineering in improving materiel condition. Initiatives discussed were the System Readiness Reviews, staffing of the Senior System Engineer position, and the implementation of the Technical Issues List. Examples of problems that have been, and are being, resolved were presented. The details of this meeting are provided in NRC Inspection Report Nos. 50-373/94021 and 50-374/94021. It continues to be firmly recognized that significant improvement is still necessary in the areas of Materiel Condition and Equipment Reliability. A strong focus by the entire Station team on important issues in these areas has been communicated.

An overall Materiel Condition Improvement Strategy has been adopted by the Station that is targeted at the goal of improved equipment performance and reliability. This strategy is comprised of the following components:

1. *Reducing Worker Tolerance/Acceptance of Problems --*

Expectations for worker performance are being reinforced by increasing management oversight and involvement in daily activities and training. An effort is underway in the radwaste area to resolve long-standing equipment problems.

2. *Prioritization for Materiel Condition Issues --*

The ownership of prioritizing the correction of equipment performance problems is with the Operations organization with strong involvement by Engineering, Work Control, and Maintenance. In addition, an Operations "Materiel Condition Improvement Focus Team" has been formed to work with the line organization to coordinate, coach and facilitate activities associated with improving equipment performance and reliability.

A Plant Operating Top 5 List was developed by Operations, with input from Engineering and Maintenance, in January 1995. The contents and priorities of the items on the list are driven by Operations. The fundamental concept of the list is to have a current list of 5 items that warrant short-term action. An owner is assigned to each item. As each item is resolved, a new one takes its place on the list. Progress has been achieved in resolving several long-standing workaround problems involving the "0" Diesel Generator HACR Relay, the Unit 2 RCIC trip/throttle valve, and suppression pool cooling.

3. *Improved Root Cause Analysis and Problem Resolution --*

Ownership in this process is with Engineering; involvement and support are provided by Operations and Maintenance. Two groups in the Systems Engineering Department were recently combined to form the Materiel Condition Group. This group, not to be confused with the Materiel Condition Improvement Focus Team, is responsible for assisting System Engineers in root cause determination, corrective action identification, and effectiveness reviews of the corrective actions relative to materiel condition items. The Reliability Centered Maintenance (RCM) Program is being developed by System Engineering to augment the Station's Preventive Maintenance efforts. To maximize the benefit of RCM, the focus will be on component problems which have been found to be common between several systems.

Senior System Engineers have been assigned since October 1994 to act as System Managers for key systems (RHR, Feedwater, Reactor Protection, and Neutron Monitoring). These engineers have been given the added responsibility for assisting, mentoring, and coaching other engineers.

A Scram Reduction Committee is being established to focus on the corrective actions following scram events, review industry scram experience for applicability at LaSalle, and communicate improvements to the Technical Review Committee.

4. *Planning and Work Execution --*

A 6-week planning process for non-outage activities has been implemented. The process allows for the walk-down of new action requests to eliminate inadequate troubleshooting prior to work execution, and to walk-down work packages prior to execution to minimize delays. A Work Control Guideline has been developed to minimize risk during performance of on-line maintenance activities.

The Electronic Work Control System (EWCS) was put on-line, and the Work Control Center was staffed in September 1994. The benefits of these initiatives will be improved work planning, coordination, and process time for all departments associated with plant work.

5. *Performance Monitoring Capabilities and Preventive Maintenance --*

The effectiveness of our materiel condition improvement efforts is being measured to ensure progress, with the ultimate goal of ensuring the long-term reliability of plant equipment. The standard INPO performance indicators, including Unit Capability Factor, Unplanned Capability Loss Factor, Safety System Failure Rate, and Safety System Unavailability, will provide a strong measure of overall progress in this area. System Engineering is developing a maintenance work history program to track repetitive equipment failures, repair costs, and repair frequencies.

A Preventive Maintenance Team (further described in Attachment 2) is in place to revitalize the Preventive Maintenance Program.

ATTACHMENT 2

FURTHER RESPONSE TO NRC INSPECTION REPORTS 50-373/93026; 50-374/93026 AND 50-373/93035; 50-374/93035

SECTIONS F.4.a AND F.4.b PREVENTIVE MAINTENANCE

One of the key elements of our overall strategy to improve the Materiel Condition at LaSalle is the full implementation of an effective Preventive Maintenance Program. The Preventive Maintenance effort has not been comprehensive in the past, and has had too narrow a focus on its application.

A Preventive Maintenance Team has been established, comprised of personnel from both the Maintenance and System Engineering Departments. The charter of this team is to revitalize the Preventive Maintenance process, with the following objectives having been set:

1. Perform a complete overhaul of the program, first taking a high-level cut at the equipment in need of Preventive Maintenance. This mainly includes large equipment, such as pumps and motors.
2. Complete an 80% comprehensive review of all systems requiring Preventive Maintenance of large equipment by March 1, 1995. The review of the remaining 20% of the systems will be completed by the Systems Engineering Department by the end of 1995.
3. All Preventive Maintenance tasks will be up to date by the end of 1995.

It is believed that the above actions will result in improved overall equipment performance. Long term ownership of the Preventive Maintenance Program will be with the System Engineering organization, as the Reliability Centered Maintenance concepts are implemented.