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November 28, 1983

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

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report Nos.
50-373/83-34 and 50-374/83-33
NRC Docket Nos. 50-373 and 50-374

Reference (a): C. E. Norelius letter to Cordell Reed
dated October 25, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. W. G. Guldemond, A. L. Madison and S. Guthrie from August 15 through September 9, 1983, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

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,

Louis O. DelGeorge

FOR Cordell Reed
Vice-President

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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RESPONSE TO INSPECTION REPORT NOS.

50-373/83-34 and 50-374/83-33

Item of Noncompliance

1. Technical Specification 3.0.4 requires that entry into an operational condition or other specified condition shall not be made unless the conditions for Limiting Condition for Operation are met without reliance on provisions contained in the action requirements. Technical Specification 3.6.1.1 requires that primary containment integrity shall be maintained in Operational Condition 3. Technical Specification 3.8.1.1 requires that Diesel Generator 1A shall be operable in Operational Condition 3.

   Contrary to the above, on August 24, 1983, Unit 1 was inadvertently taken from Operational Condition 4 to Operation Condition 3 without establishing primary containment integrity and with the 1A Diesel Generator inoperable.

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

Response

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

1. A Work Request was issued to repair the "B" RHR Heat Exchanger Discharge Valve Motor. The tripping problem was found to occur only when attempting to cycle the valve to throttle flow with the RHR pump running. Further tests indicated a failure in the Overload Device. The Overload Device was replaced, tested and the valve decleared operable on September 15, 1983.

2. LOP-RH-07 - Shutdown Cooling procedure was revised on August 29, 1983. This revision identifies expected indications for the operator, to assist in determination of proper heat exchanger operation. Indications for no flow, low flow, and proper flow, are provided.

3. A meeting with the operating staff involved in the event was held on August 25, 1983. A complete discussion of the event occurred with emphasis on the judgemental errors involved. While it was apparent that the transient was recognized and corrective action was implemented, the individuals agreed that the full significance of the temperature increase was unrecognized, and the corrective measures undertaken were incomplete. The quantity and complexity of testing and maintenance activity in progress was a significant contributing factor in this incident.

4. A request for modification of the common RHR Shutdown Cooling Suction Line, 1RH04C, to install a temperature element/ indicator/alarms, was issued on September 1, 1983. This additional instrumentation will provide an accurate indication of actual coolant temperature regardless of the flow path utilized through the system during Shutdown Cooling Operation.

5. The Operating Assistant Superintendent has requested the training department to prepare and conduct a training module on the RHR System with emphasis on the Shutdown Cooling System and the proper indication of system operability. This instruction is scheduled with the licensed Operating Staff in the first quarter of 1984.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NON-COMPLIANCE

We recognize the uniqueness and complexity of our effort to concurrently complete the Start-up program of Unit 1 while working toward completion of the pre-operational testing phase of Unit 2. As outlined in our letter to the NRC on November 7, 1983, we have implemented a wide range of additional administrative control and supplemental manning, to assist the operating staff in maintaining awareness of plant status and conditions, and firm control of related activities in progress. Additionally, the Station Superintendent has conducted tailgate meetings with the Operating Department supervision and employees, to stress the importance of control of activities in progress. The Shift Engineers have also been directed to conduct tailgates with their shifts on the topics of concern expressed at the enforcement conference held on September 30, 1983.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The full range of corrective actions taken to ensure a full understanding of this incident by all operating staff and the corrective actions required to minimize the possibility of recurrence have been completed at this time with the following exceptions:

1. Item C.4 "Modification to the RHR System" Engineering work is presently underway and scheduled for completion on January 1, 1984. Installation of this equipment will be accomplished prior to startup following the first refueling outage on Unit 1.

2. Item C.5 "Training Department Presentation on the RHR System." Presentation of the training module is scheduled for completion by March 30, 1984.

Item of Noncompliance

2. Technical Specification 6.2.A.1 requires that detailed written procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, shall be followed. That Regulatory Guide recommends procedures for startup of onsite electrical systems.

   LaSalle Operating Procedure LOP-DG-02, "Startup of Diesel Generator 1A (2A) 1DG01K(2DG01K)," Step F.1.h.6, requires that the diesel generator output breaker be closed when the synchroscope is just before the 12 o'clock position.

   Contrary to the above, on August 15, 1983, an operator failed to follow Step F.1.h.6 of LOP-DG-02 with the result that the 2A Diesel Generator was paralleled out of phase and damaged.

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

Response

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

1. The inspection of the generator revealed that several end turns on the generator wiring were displaced and the replacement of the generator was required. The generator was replaced and acceptance test satisfactorily completed on September 16, 1983.

2. A Professionalism Investigation was conducted to determine the cause of the event. The root cause was found to be personnel error. The operator allowed himself to be distracted in his effort at paralleling the Diesel Generator by other activities in progress at the same time. This resulted in his inattention to required procedural limitations and failure to observe the synchronization process. The Assistant Superintendent Operations and the Nuclear Division Operations Manager emphasized the importance and necessity of error free operations and maintaining concentration on the evolution in progress with the operator involved.

3. A summary of this event is being presented to all licensed operators. Particular emphasis is given to maintaining error free operations and not allowing distractions to operations. This training will be completed on December 5, 1983.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NON-COMPLIANCE

Modification packages have been prepared and equipment installed to provide synchro-check relays on all five Emergency Diesel Generators. These modifications will prevent closing the respective Diesel Generator Output Breakers without the output being in synchronization with the voltage present on the bus. These modifications were completed on November 18, 1983.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All corrective actions identified for this violation are complete at this time with the following exception:

1. Item C.4 - Required training on this event is being handled by the Shift Engineers and is scheduled for completion prior to December 5, 1983.

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Item of Noncompliance

3. Technical Specification 6.2.A.1 requires that detailed written procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, shall be followed. That Regulatory Guide recommends procedures for residual heat removal (RHR) system operation.

   LaSalle Operating Procedure LOP-RH-01, "Filling and Venting the Residual Heat Removal System," contains a precaution that the procedure is written to fill all three loops concurrently and that individual loops can be filled by operating only that loop's valves.

   Contrary to the above, on September 1,1983, while utilizing LOP-RH-01 to fill and vent the "A" RHR system, the unit operators did not follow the precaution and take into account that the "B" RHR system was operating in shutdown cooling mode. This resulted in filling the reactor vessel through the "B" RHR system to a level of 350 inches, filling the main steam lines up to the inboard main steam isolation valves, releasing water to the drywell equipment drain system through the open vessel head vent, and pressurizing the reactor vessel to approximately 20 pounds per square inch.

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

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

1. A Professionalism investigation was conducted to determine the cause of this event. The root cause was determined to be an incomplete procedure review as well as operator inattentiveness. A discussion was held with the operators involved to emphasize the necessity of a complete review of the pertinent operating procedure prior to starting an evolution. In addition, LOP-RH-01 is being revised to emphasize that the Cycled Condensate fill to the RHR Shutdown Cooling System Suction Header should not be opened if an RHR Shutdown Cooling Loop is already in operation. This action will be completed on January 1, 1984.

2. An in-depth review of the RHR System has been scheduled for the Licensed Operating Staff in the first quarter of 1984. This review will emphasize Shutdown Cooling Operations and Procedures. This action will be complete by March 30, 1984.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NON-COMPLIANCE

The station Superintendent has conducted tailgate meetings with all operating personnel to emphasize the necessity of maintaining awareness of plant status and the importance of firm control of plant activities in progress. Additionally, the Shift Engineers are discussing the topics of concern in the Enforcement Summary with their crews.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED.

All corrective actions associated with this violation have been completed at this time with the exception of:

1. Item C.1 - will be completed by January 1, 1984.

2. Item C.2 - will be completed by March 30, 1984.

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Item of .oncompliance

4. Technical Specification 6.2.A.1 requires that detailed written procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, shall be followed. That Regulatory Guide recommends procedures for surveillance testing and contamination control.

   LaSalle Instrument Surveillance LIS-RD-02, "Control Rod Scram Accumulator Level Detector Functional and Pressure Detector/Indicator Calibration Test," requires that precautions be taken due to "trapped pressure and contaminated water."

   Contrary to the above, on August 22, 1983, instrument mechanics were observed performing LIS-RD-02 without taking the required precautions.

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

Response

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

Immediately after notification from the NRC resident, the shift engineer, and the Instrument Department scheduler requested a survey be performed by Radiation Protection personnel. No contamination was found. It was agreed at that time, however, to wear rubber gloves to prevent possible contamination and that terry towels be used to absorb any water leakage which may occur from the test process.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NON-COMPLIANCE:

As a follow up action within the Instrument Department, it was reiterated during a safety meeting that when a procedure states "Water found is to be considered contaminated" that the statement means that, as a minimum, rubber gloves should be worn and terry towels used to absorb any leakage.

DATE OF FULL COMPLIANCE:

This training was documented on August 25, 1983.

Item of Noncompliance

5. Technical Specification 6.2. requires that radiation control procedures be maintained and followed.

LaSalle Radiation Procedure LRP-1000-1, "Radiation Protection Standards," requires whole body bioassay at a minimum frequency of one year for all individuals authorized to receive radiation exposure.

Contrary to the above, the inspectors found that a large number of individuals authorized to enter radiation areas and/or airborne radioactivity areas did not have whole body bioassay within the previous year. Further, sufficient administrative controls were not in place to ensure compliance with those provisions of LRP-1000-1.

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

Response

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The status of whole body counts was immediately reviewed. Monday thru Friday schedules were set up on a priority basis and RCT's were scheduled accordingly to man the body counter. Those people working backshift who required a body count were counted on backshift. Strong emphasis was put on people keeping their appointments and followup was done when necessary. At the present time all but a few people (10-15) are current with their body count, in accordance with their required frequency.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NON-COMPLIANCE:

Scheduling for whole body counting will begin immediately with the new calendar year. Those requiring a body count once a year will be counted the second quarter; those requiring a body count twice a year will be counted in the first and third quarters, and those requiring a body count three times a year will be counted in the first, second, and third quarters. The fourth quarter will be used for make-up and special consideration.

DATE OF FULL COMPLIANCE:

The whole body counts should be current by the end of 1983 in accordance with the individual required frequency.