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ComEd

April 28, 1995

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: LaSalle County Nuclear Power Station Units 1 and 2
Commonwealth Edison (ComEd) BWR Improvement Strategy
NRC Docket Nos. 50-373 and 50-374

Reference: R. E. Querio letter to USNRC dated December 23, 1994

Dear Mr. Russell:

The purpose of this letter is to provide an update on the progress of improvements at LaSalle County Nuclear Power Station Units 1 and 2. These improvements are being accomplished to fulfill the objectives of the LaSalle Management Overview/Course of Action (COA), dated May 1994. This letter supplements my letter of December 23, 1994 (reference) which reported our progress for August through December.

The LaSalle COA was being implemented in 1994 via selected focus areas termed Near-Term Initiatives. Based on management review in early 1995 of progress toward the objectives in the COA, we concluded that there was not sufficiently clear direction in all areas to successfully achieve the goals of the COA. As a result, we have revised our implementing action plans for 1995 (1995 Annual Plan). These plans describe the actions that will be taken in 1995 to accomplish the objectives of the COA in eight focus areas, and now include detailed, discrete action steps with individual completion dates and clear accountability for completion of the actions. The action plans clearly identify the objectives of these activities and their relationship to the COA issues and objectives. Each of the eight focus areas in the 1995 Annual Plan includes performance measures to be used in evaluating progress toward completion, and has a sponsoring senior manager to provide overall leadership in its completion.

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The eight focus areas of the 1995 Annual Plan are as follows:

Materiel Condition	Training Improvement
Radiation Protection	Outage Performance
Issues Management	Technical Support Performance
Management and Leadership	Operations Performance

- The Management and Leadership focus area is of prime importance. We recognize that management weaknesses have been a major contributor to the performance problems experienced at LaSalle. We have been assembling an improved senior management team which will be capable of directing and completing the improvement objectives in the LaSalle COA, and continuing and sustaining improvement over the longer term.

  - Senior management changes since 1994 have included the Site Vice President, Station Manager, Operations Manager, Maintenance Superintendent, Radiological Protection Manager, Chemistry Supervisor, Site Engineering Manager, Systems Engineering Manager, and Support Services Director. Selected senior management positions are being filled with personnel from outside of the ComEd system, bringing a broader industry perspective to LaSalle. We will continue to make improvements to our management team as warranted to ensure our performance improvements are realized and sustained.

  - LaSalle senior management team members and licensed operations personnel participated in a Conservative Decision Making Seminar. This seminar was led by the BWR Vice President and the three BWR Site Vice Presidents. During the sessions the Vice Presidents communicated their expectations regarding the proper conservative decision making process. This seminar was designed to foster a thought process to ensure that a conservative approach to safety is foremost in all operational decisions.

- Operating experience in 1994 emphasized the need for improvements in Materiel Condition. A number of unplanned outages occurred that were primarily the result of plant materiel condition. To assist Operations in leading the materiel condition improvement effort a new position was created, Plant Operations Superintendent. Additionally particular attention has been focused within Work Control on materiel condition items, including forced outage preplanning, the success of which was recently demonstrated in the forced outage of Unit 1 in February 1995. The following is a summary of selected items that have been accomplished to date. A detailed summary of these accomplishments will be provided in the Course of Action Progress Report, which will be issued by May 5, 1995.

  - The EHC system on Unit 2 has had a history of numerous leaks and in 1994 experienced a vibration induced fatigue hydraulic piping failure that led to a reactor scram. New EHC supports were added to improve stability and minimize the fatigue possibility on both units. System leaks were repaired and new Fuller's Earth filters were installed to eliminate a chronic recurring leak on the old filter housings.

  - A digital control system (Lovejoy) has been installed on the Unit 2 Turbine Driven Reactor Feed Pumps to improve reliability of Reactor Water Level Control (RWLC).

  - During 1994, Unit 1 was forced to shutdown due to a failed condenser boot and subsequent loss of condenser vacuum. An improved boot material has been installed on all three condenser hoods on both units.

  - Power derates have been experienced due to condensate and condensate booster pump availability. To improve pump reliability, a comprehensive approach to inspection and repair of system components has been implemented over the past several months on all pumps including gear boxes, coupling alignments, grounding components, pump alignment, pump shafts, lubrication and threaded joints.

- Numerous long-standing equipment problems were eliminated on Unit 2 during the current refuel outage (L2R06). Included are replacement of outboard MSIV solenoid valves with valves of a better design, replacement of the Reactor Protection System Motor Generator Set feed breakers to allow starting the M/G set without tripping the breakers, replacement of MSIV limit switches, and completion of testing and modifications to motor operated valves required by Generic Letter 89-10.

- Prior to L2R06, the unit experienced degraded reactor water chemistry problems due to condenser tube leaks resulting from scale buildup and resulting microbiologically induced corrosion (MIC). Eddy current and leak testing after extensive condenser cleaning identified 213 degraded tubes which were plugged.

- Open work requests are being prioritized by System Engineering in cooperation with Maintenance and Operating. This effort includes consideration of importance to the safety and reliability of the units, the age of the work requests, and confirmation that the proposed work item is still valid. 2000 open work requests, which is 90 percent of the total open work requests, have been prioritized enabling better scheduling of work while the unit is on-line.

- System Engineering is conducting more thorough walkdowns of plant systems and has lowered the threshold of deficiency identification. The current focus is on important safety and reliability systems (approximately 40) on Unit 2 and will be followed by Unit 1 systems.

- Substantive improvements have been achieved in Radiation Protection including:

  - Radiation Protection personnel have assumed assignments in other organizations within the plant in order to heighten their presence in the plant. In L2R06 an RP technician acted as Drywell Coordinator lending an increased focus to radiation work practices during outage execution.

  - Improvements in the control of contamination include the establishment of a single ingress/egress point from the RPA, the placement of portal monitors at this exit, more conservative setpoints on the IPM-7 personnel contamination monitors and the use of small article monitors. No radioactive material control incidents have occurred since September 1994.

  - Several activities have resulted in reduction of the radiation source term. The chemical decontamination of the RHR System during L2R06 resulted in dose rate reductions by a factor of two to eight. This resulted in an estimated 70 person-rem savings for maintenance activities in L2R06. For example, work on the RHR full flow test valve was completed with a dose savings of 8 Rem when compared to similar work in previous outages. L2R06 Recirculation System decontamination efforts removed 91 curies, resulting in a dose reduction by a factor of about 2.5. Aggressive system flushes and hydrolazing efforts to reduce general area dose rates are ongoing.

  - Implementation of depleted zinc injection on Unit 1 proved successful in maintaining dose rates in the Unit 1 drywell at a reduced level. Mid-cycle surveys on Unit 1 Reactor Recirculation Piping indicate no substantial increase in dose rates from L1R06 post chemical decontamination levels. Zinc injection will commence on Unit 2 at the end of L2R06.

- Important programmatic changes have been made in the Issues Management program. Monthly assessment meetings are conducted by the Vice President with all departments, with the objective to emphasize the importance of self-assessment activities, and to identify adverse trends in station activities requiring near-term corrective actions.

- Activities are underway in the area of Training to improve line management ownership of program content, correct deficiencies in OJT/TPE performance and provide enhancement of the self evaluation process.

  - Several seminars/workshops have been held for managers to communicate their roles and responsibilities for training and provide managers with increased knowledge of the training process.

  - Training Advisory Committees are chaired by the appropriate Department Head.

  - A Senior Training Council (STC) has been established to provide management oversight of training programs.

  - Training Performance indicators were revised to improve the information available to the Training Advisory Committees and the Senior Training Council. These performance indicators are an important input to identify corrective actions for the training program.

  - A training benchmarking visit has been completed to the Duane Arnold Station to review improvements made to their training programs. Several good practices were identified, including use of a Training Identification Form (TIF) to track all training requests. We are in the process of implementing these lessons learned.

- Several changes have been made to improve work management and Outage Performance. This will ensure that work items are completed in order of priority, and that work is accomplished more effectively and efficiently. Improvements have been realized in work completion rates as a result of the following initiatives:

  - A Work Control Center (WCC) was implemented in September 1994, and includes personnel from Maintenance, Operations, Work Control, Engineering, and Radiation Protection. The ComEd Electronic Work Control System (EWCS) has been implemented. Improvements in the areas of work planning, work execution, and use of the WCC and EWCS during L2R06 resulted in fuel load being 16 days earlier than the previous two outages.

  - A single point of contact (SPOC) for all outage related questions has been established. The individual in this position is easily accessible and the position is manned continuously for the duration of the outage.

  - The role of shift outage director (SOD) has been expanded to include 24-hour monitoring of outage related jobs in the field, and to facilitate activities necessary to maintain the outage work flow. Both the SPOC and SOD concepts were identified during a benchmarking trip to Limerick Station.

An area of continuing weakness is the management team's ability to effectively communicate and apply performance feedback to the station staff. Strong emphasis has been placed on managers and supervisors regarding the importance of reinforcing good work practices in the field and curtailing poor work practices on the spot. Our expectations are for supervisors to spend time in the field with the workforce communicating and supplying immediate performance feedback.

Senior management holds daily accountability meetings which are starting to improve communications and teamwork at the senior manager level. The accountability meetings are designed to force us to deal with issues and confront problems head-on.

We believe the 1995 Annual Plan is focused on the highest priority items and through dedication to this plan we will improve overall performance. Materiel Condition improvements are being emphasized. While this is an important area, we recognize that we continue our improvement activities in all of the focus areas in 1995, and that our long-term success demands that we continually assess our plans to assure satisfactory implementation. In all our efforts, we remain committed to ensuring the continued safe operation of LaSalle County Station.

Respectfully,

for Robert E. Querio
Site Vice President
LaSalle County Station

RQ/rl

cc: J. Taylor, Executive Director for Operations
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