



**Commonwealth Edison**

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March 29, 1984

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

Subject: LaSalle County Station Units 1 and 2  
Response to Inspection Report Nos.  
50-373/84-02 and 50-374/84-01  
NRC Docket Nos. 50-373 and 50-374

Reference (a): W. D. Shafer letter to Cordell Reed  
dated March 2, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. W. D. Guldemon, S. Guthrie, and D. Evans on January 16, 1983 through February 10, 1984 of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. As noted in Reference (a), with respect to Item 3, the inspection showed that action had been taken to correct the identified item of noncompliance and to prevent recurrence. Therefore no reply to that item was required. The Commonwealth Edison Company response to the remaining items of the Notice of Violation is provided in the enclosure.

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

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT

Commonwealth Edison Company  
LaSalle County Station Units 1 and 2  
Response to Notice of Violation

ITEM OF NONCOMPLIANCE

1. Technical Specification 6.2.B states, "Radiation control procedures shall be maintained, made available to all station personnel, and adhered to." LaSalle Radiological Procedure LRP 1120-1, "Contaminated Area Access", defines the primary method for control of access to controlled areas as the posting of appropriate signs at the access control point. LaSalle Radiological Procedure LRP 1130-1 defines the specific wording for the signs required to be posted in an area where contamination levels exceed 1000 dpm/100 cm<sup>2</sup>.

On January 16, 1984, the 673' elevation of Unit 1 reactor building was determined to be contaminated to a level in excess of that required for posting as a controlled area. This area was not posted, thus affording unrestricted access to and egress from a contaminated area and resulting in personnel contamination.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

As stated in the inspection report, the entire 694' and 673' levels of Unit 1 reactor building were immediately posted as a contaminated area.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

This incident was discussed with personnel involved. In addition, training will be performed for all Rad/Chem Technicians and Foreman to improve awareness with regard to posting large areas with multiple entrances and exits. AIR 01-84-67048 has been initiated to track the completion of this training.

DATE OF FULL COMPLIANCE

Full compliance has been achieved as a result of the January 17, 1984, posting of the Unit 1 Reactor Building 694' and 673' elevations.

#### ITEM OF NONCOMPLIANCE

2. Technical Specification 6.2.A: Detailed written procedures shall be prepared, approved, and adhered to for those applicable procedures recommended by Appendix "A" of Revision 2 of Regulatory Guide 1.33. Appendix "A" of Revision 2 of Regulatory Guide 1.33 recommends, in part, procedures for equipment control including locking and tagging. LaSalle Administrative Procedure LAP-240-1, "Use of Locks on Valves", Operating Surveillance Procedure LOS-LV-SR1, "Locked Valve Position Verification", and Operating Procedure LOP-MS-06, "Wetting of Inboard and Outboard MSIV's for Surveillance Testing", establish requirements for control of locked valves.

On January 16, 28 and February 2, 1984, a total of six normally locked valves which should have been controlled by the above referenced procedure, were found unlocked.

#### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The subject valves were repositioned and locked per LAP-240-1, immediately following discovery/notification of the events resulting in the noncompliance.

#### CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

A review of security records was conducted in an effort to determine the identity of all personnel who could have been in the vicinity of the valve in question during the period of time it became mispositioned. No additional information surfaced during this review.

In an effort to tighten control of locked valves, new locks were ordered in January 1984 and delivery is expected by May 4, 1984. Upon receipt, these new locks will replace the existing locks on all valves listed in the revised LAP-240-1, (locked valve checklist).

A revision to LAP-240-5 (key control) is being prepared so that the keys for the new locks will be controlled by the Shift Engineer. This revision will be approved and implemented upon receipt and distribution of the new locks.

A periodic management audit of random portions of the locked valve list has been initiated. This audit was first performed on 2/8/84 and is scheduled on a regular basis until June 1984.

Additionally, since the event in question, a full locked valve checklist LAP-240-1 has been conducted on Unit 1 on 3/5/84 and on Unit 2 on 3/24/84 with no additional mispositioned valves identified.

A revision to LAP 240-1 (locked valve checklist) which reduces the number of locked valves has been prepared and is currently in on-site review. This revision will be approved and available for NRC comment by 4/15/84.

This event has been the subject of Operating Department Tailgate Sessions in the continuing effort to ensure all personnel understand the importance of properly controlling locked valves.

DATE OF FULL COMPLIANCE

Full compliance was achieved immediately. It is expected all actions will be completed and all proposals implemented by June 1, 1984.