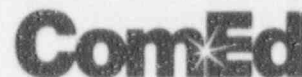


Commonwealth Edison Company
LaSalle Generating Station
2601 North 21st Road
Marseilles, IL 61341-9757
Tel 815-357-6761



May 30, 1995

**United States Nuclear Regulatory Commission
Washington, D.C. 20555**

Attention: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-373/95003; 50-374/95003
NRC Docket Numbers 50-373 and 50-374.

Reference: 1. Lewis F. Miller, Jr., letter to R.E. Querio,
Dated April 27, 1995, Transmitting
NRC Inspection Report 50-373/95003; 50-374/95003.

Enclosed is ComEd's response to the Notice of Violation (NOV) that was transmitted with the Reference 1 letter and NRC Inspection Report Nos. 50-373/95003; 50-374/95003.

The reference 1 letter identified one violation concerning an inadequate safety screening associated with a procedure change to RHR operating procedure LOP-RH-13 "Suppression Pool Cooling Operation," Revision 16, dated October 8, 1993, and concluded that the safety screening was inadequate and failed to identify a procedural change that created a condition where equipment could be operated outside of the plant's design basis.

We recognize the importance of a sound philosophy and approach in performing safety screenings and evaluations and have made significant improvements in our 10 CFR 50.59 screening process since this event occurred. LaSalle Station realizes that it is imperative to instill a correct and conservative safety philosophy in personnel performing these evaluations. We have instituted a series of procedure revisions and training sessions to correct these deficiencies. We are committed to maintaining a conservative safety culture and to provide guidance for determining whether any change, test, or modification could reduce the margin of safety or possibly cause an accident of a different type than any previously evaluated in the FSAR.

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If there are any questions or comments concerning this letter, please refer them to me at (815) 357-6761, extension 3600.

Respectfully,



R. E. Querio
Site Vice President
LaSalle County Station

cc: J. B. Martin, Regional Administrator, Region III
W. D. Beckley, Project Manager, NRR
P. G. Brochman, Senior Resident Inspector, LaSalle
D. L. Farrar, Nuclear Regulatory Services Manager, NORS
Central file

**ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-373/95003, 50-374/95003**

VIOLATION: 373(374)/95003-02

During an NRC inspection conducted on February 18 through March 24, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions or procedures, of a type appropriate to the circumstances.

Contrary to the above, on October 8, 1993, Revision 16 to LaSalle operating procedure LOP-RH-13 allowed operation of the low pressure ECCS pumps in a configuration that was outside the plant's design basis and hence was not appropriate to the circumstances.

LaSalle operating procedure LOP-RH-13, "Suppression Pool Cooling Operation," Revision 16, Steps F.1.a and F.1.b, placed two keylock switches in test. In the event of an accident, three of the four low pressure ECCS pumps would not have started and injected automatically, but would have required immediate operator action to do so. This procedure change created a condition where the ECCS pumps could be operated in a condition that was outside of the plant's design basis (because more than two of four pumps were incapable of automatic operation).

LaSalle Final Safety Analysis Report (FSAR), Section 6.3.2.8, "Manual Actions," states, "Initiation of ECCS is Completely Automatic. No operator action is required for at least 10 minutes after initiation."

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

ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-373/95003, 50-374/95003

REASON FOR VIOLATION: 373(374)/95003-02

ComEd agrees that an adequate safety screening to evaluate LaSalle Operating Procedure LOP-RH-13, "Suppression Pool Cooling Operation," Revision 16, was not conducted as prescribed by procedure. This resulted from a lack of attention to detail in the review process for both the procedure and safety evaluation documents. The safety evaluation screening was completed to determine the acceptability of the procedure revision. For this safety evaluation, LAP-1200-13 "Safety Evaluations", Attachment B "Safety Evaluation Screening", was completed. The individual who processed this particular safety evaluation failed to identify, in his review of the procedure revision, that a condition was created where the ECCS pumps could be operated outside of the plant's design basis.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED
(373(374)/95003-02):

LaSalle operating procedure LOP-RH-13, "Suppression Pool Cooling Operation," Revision 18, was revised on December 29, 1994. An annual training module for LAP1200-13, "Safety Evaluations" was developed with specific objectives to: discuss the performance of safety evaluations, provide examples of both good and bad evaluations and screenings, and provide industry and NRC information on performing safety evaluations.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS
(373(374)/95003-02):

A sample audit of previous 10 CFR 50.59 safety evaluations, looking for any unreviewed safety concerns or questions, was performed in the first quarter of 1995 and another audit will commence after the L2RO6 outage. Continuing training is being provided on a quarterly basis to include discussions of:

- 1) Why it is necessary to:
 - describe the proposed activity.
 - describe the purpose of the proposed activity.
 - list the basis for your conclusions and what specific issues were addressed.
- 2) How to determine if the proposed change, test, or experiment involves an unreviewed safety question with emphasis on:
 - how to determine if the proposed activity could possibly cause an accident of a different type than any previously evaluated in the FSAR.

--how to determine if the proposed activity will reduce the margin of safety.

3) How we maintain a conservative safety culture.

Additional objectives of this training will be based on recommendations contained in the ISEG 10CFR50.59 Review dated October 14, 1994 (CAR 01-94-062).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (373(374)/95003-02):

All corrective actions are complete and full compliance was achieved on December 29, 1994 when the revision to LaSalle operating procedure LOP-RH-13, "Suppression Pool Cooling Operation," Revision 18, was completed. This revision removed the use of the keylock switches to bypass the automatic initiation.