



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 10, 1992

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: LaSalle County Nuclear Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-373/91020; 50-374/91020
NRC Docket Nos. 50-373 and 50-374

Reference: Brent Clayton letter to Cordell Reed dated
December 13, 1991 transmitting NRC Inspection
Report 50-373/91020; 50-374/91020

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited one Severity Level IV violation. The violation concerned the failure to notify the NRC within 4 hours after determining that the testing for certain undervoltage relays was inadequate. CECO's response is provided in the following attachment.

If your staff has any questions or comments concerning this letter, please refer them to Annette Derenberg, Compliance Engineer at (708) 515-7352.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

Attachment

cc: A. Bert Davis, NRC Regional Administrator - RIII
B. Siegel, Project Manager - NRR
T. Tongue, Senior Resident Inspector

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**RESPONSE TO LEVEL IV VIOLATION
INSPECTION REPORT
50-373/91020; 50-374/91020
ATTACHMENT A**

VIOLATION: IR 50-373/91020-01

10 CFR 50.72 (b)(2)(iii)(D) requires the licensee to notify the NRC as soon as practical and in all cases within four hours of the occurrence of any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident.

Contrary to the above, on November 7, 1991, notification of the NRC was not made within four hours when it was determined that inadequate testing of the undervoltage relays for the safety divisions 1, 2, and 3 electrical buses on both units 1 and 2 could have prevented any or all Emergency diesel Generators from performing their safety functions during an accident condition.

REASON FOR THE VIOLATION:

Station management believed that NRC guidance similar to that in Generic Letter 87-09 existed and was applicable to the specific situation. It was believed that this guidance allowed a 24 hour provision period during which the surveillances could be performed without declaring the equipment inoperable. On November 8, 1991 at approximately 7:30 a.m., Regulatory Assurance reviewed the event, questioned the potential of having missed an ENS notification, and initiated additional review. Further investigation by senior station management led to a decision that the 24 hour provision period was inappropriately applied to Technical Specification 4.0.3. This action led to not declaring the Diesel Generators inoperable and not entering Technical Specification 3.0.3. As a result, the need for a 10CFR50.72 notification was not recognized.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED:

ENS notification was initiated on November 8, 1991.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

This event has been discussed among LaSalle County Station, Senior Management and Regulatory Assurance personnel to ensure missed surveillances are dispositioned properly.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved November 8, 1991.