



Commonwealth Edison

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February 29, 1984

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

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report
Nos. 50-373/83-53 and 50-374/83-58
NRC Docket Nos. 50-373 and 50-374

Reference (a): W. D. Shafer letter to J. G. Keppler
dated January 30, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. W. Guldemon, S. Guthrie, and D. Evans on December 17, 1983 through January 13, 1984, 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,

D. L. Farrar
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - LSOS

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ATTACHMENT

Item of Noncompliance: 374/83-56-02

1. Technical specification 6.2A.1 requires, in part, detailed written procedures including applicable checkoff lists shall be prepared, approved, and adhered to for the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. Section 2 of the subject appendix recommends procedures for refueling and core alterations. Step F.6.a of LaSalle Procedure LFP 100-1, "Master Refuel Procedure", requires the reactor operator to update the control room tag board following completion of individual steps on the Nuclear Component Transfer List.

On January 4, 1984, the Unit 2 reactor operator failed on several occasions to update the control room tag board following completion of individual steps on the Nuclear Component Transfer List during Unit 2 fuel load.

Correction Action Taken and Results Achieved

The Unit 2 control room tag board was updated to reflect current status when the item was brought to the attention of control room personnel. This action occurred immediately following the observation of the non-compliance.

Corrective Action Taken to Avoid Further Non-Compliance

The reactor operator on duty when the non-compliance was observed and corrected was instructed to adhere to the requirements of the appropriate procedure during future fuel movements. Shift daily orders for January 4-5 include a reminder to all shifts to ensure that the tag board is updated in accordance with the procedure. LFP-100-1 is also included on our required annual reading list.

Date of Full Compliance

January 4, 1984.

Item of Noncompliance: 373/83-53-01

2. Technical Specification 4.1.3.7.C requires, in part, "The control rod position indication system shall be determined OPERABLE by verifying...that the control rod position indicator corresponds to the control rod position indicated by the "full-out" position indicator when performing Surveillance Requirement 4.1.3.6.b."

On January 5, 1984, the licensee failed to perform the "full-out" position indicator verification of Technical Specification 4.1.3.7.c during a Unit 1 reactor startup.

Corrective Action Taken and Results Achieved

The light bulbs for the full-out indication on the full core display were burned out. The operator noticed that the bulbs were out during the startup and, since he had other positive indication that the rods were full-out, he replaced them as soon as conditions in the control room permitted. The indication was normal when the bulbs were replaced.

Corrective Action Taken to Avoid Further Noncompliance

All shifts were advised to be more alert for this condition when performing this surveillance in the daily orders for 1/05/84. A check of all energized lights is performed once per shift in accordance with LAP-1600-2.

Date of Full Compliance

January 5, 1984.

Item of Noncompliance: 373/83-53-02

3. Technical Specification 6.2.B requires, in part, "Radiation control procedures shall be maintained, made available to all station personnel, and adhered to." LaSalle Radiation Procedure LRP 1120-1, step F.6 states, "Personnel must always exit from controlled areas in a manner which is consistent with Reference (a) and any specific instructions which may have been issued by Radiation Protection." LaSalle Radiation Procedure LRP 1430-1, step F.1 states, in part, "The removal and reuse of material from a controlled area requires an unconditional release by Radiation Protection." Step F.3 states, in part, "A Rad/Chem Technician will determine that all surfaces of the material are free of detectable contamination before an unconditional release is issued."

On January 11, 1984, numerous cases of personnel exiting a controlled area in violation of posted instructions for personnel monitoring were observed. Additionally, numerous personnel were observed removing material from a controlled area without obtaining unconditional releases for the materials.

Corrective Action Taken and Results Achieved

On January 9, 1984, a short refresher training program was developed. On January 10, 1984, training was initiated. This training provides instructions to station personnel concerning the proper methods of performing a personal external contamination survey using a hand held GM probe. Guidance is provided for both the hands and feet survey and the whole body frisk survey. Between January 10 and January 17, the following CEC departments and contractor personnel have been retrained: Radiation/Chemistry, Instrument Maintenance, Electrical Maintenance, Mechanical Maintenance, Stationmen, Storenroom, Licensed Operators, Clerical, Training, Morrison Maintenance Contractor personnel, and the training instructor for the Burns Security force. The training instructor for the Burns Security force, in turn, initiated training of the Burns Security force during the week of January 16, 1984. This training should be completed during the week of February 27, 1984. In addition, on January 20, 1984, the Training Department personnel made a video tape demonstration of the proper methods of performing personal external contamination survey. During the week of January 23, 1984, the Training Department initiated the use of the video tape for Annual Retraining and N-GET classes.

On January 12, 1984, a letter was distributed to all personnel to request strict adherence to contamination control procedures, specifically the frisking of the hands and feet and the unconditional release survey requirements for tools.

In an effort to alleviate these contamination control concerns, Radiation/Chemistry Technicians have been temporarily assigned to the main controlled area exit, on the 710 elevation of the Turbine Building, during the hours of 0730 to 1800, Monday through Friday. These individuals are stationed at this location to perform two functions:

- 1) Provide continual survey capabilities at the major controlled area exit to expedite the unconditional release of tools and materials from the uncontrolled areas; and,
- 2) Observe the personal frisking being performed at this major location and to correct through example any deficiencies noted.

Corrective Action Taken to Avoid Further Noncompliance

The short refresher training programs are continuing to retrain the majority of the personnel onsite in the proper personal contamination monitoring techniques. In addition, N-GET and Annual Retraining classes are emphasizing the correct contamination control procedures concerning personal contamination monitoring and unconditional release survey requirements. A LSCS procedure will be written and implemented to give guidance for performing proper personal contamination monitoring techniques.

Date of Full Compliance

Refresher training of onsite personnel should be completed by April 1, 1984. An approved procedure for personnel contamination monitoring will be implemented by April 1, 1984.