



**Commonwealth Edison**

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June 22, 1983

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

Subject: LaSalle County Station Units 1 and 2  
Response to Inspection Report Nos.  
50-373/83-16 and 50-374/83-14  
NRC Docket Nos. 50-373 and 50-374

Reference (a): J. F. Streeter letter to Cordell Reed  
dated May 24, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. D. Lanksbury and S. G. DuPont on April 11 through May 6, 1983, 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*  
CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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RESPONSE TO INSPECTION NOS.

50-373/83-16 and 50-374/83-14

ITEM OF NONCOMPLIANCE

1. 10 CFR 50, Appendix B, Criterion X, states, in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity." FSAR Section 8.3.1.3.2 states, in part, "A cable can only be routed and installed in a tray with the appropriate segregation code as specified in FSAR Table 8.3.5." FSAR Section 8.3.1.4.2.(d) states, in part, "NSR (Non-Safety Related) cables in the reactor building can be installed in ESF trays. However, once committed to a tray of one division, that cable cannot be...permitted to cross from an ESF to an NSR tray."

Contrary to the above, three separate inspections of safety-related Cable 2RH-103, 2RH-215, and 2RH-233 conducted between October 2, 1979, and March 30, 1981, failed to verify the cables conformed to the routing criteria. Namely, nonsafety-related Cable 2RH-363 which was not coded for or committed to ESF Division 2 was routed incorrectly into an ESF Division 2 cable tray and then routed into its appropriate tray. Additionally, the BOP cable was wrapped around three safety-related ESF Division 2 cables as it crossed through the ESF Division 2 tray.

RESPONSE

Corrective Action Taken and Results Achieved

Howard P. Foley Company initiated Corrective Action Report #5766 and Rework #2957 on May 2, 1983. Cable 2RH-363 was removed from the ESF Division 2 cable tray and retrained into the proper cable tray.

Corrective Action Taken To Avoid Further Noncompliance

Commonwealth Edison Company/Howard P. Foley Company performed additional surveys in the cable spreading room. No other cable separation problems were found. Consequently, the example is considered an isolated incident.

Additional preventive corrective actions taken include addition of an addendum to Howard P. Foley Company Work Instructions to provide further guidance concerning safety division separation criteria. Quality control inspectors and craft personnel were given a training session on the addendum additions.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

## ITEM OF NONCOMPLIANCE

2. 10 CFR 50, Appendix B, Criterion II states, in part, "Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include...suitable environmental conditions for accomplishing the activity, such as adequate cleanness...". H. P. Foley and Company Quality Control Cable Pulling Checklist requires, in part, that raceways be clean and free of abrasives. LaSalle County Station Procedure, LAP 900-15 states, in part, "Trash, rubbish, etc are not present in cable trays, in or on top of switchgear, instrument racks or control cabinets."

Contrary to the above, various sharp and abrasive objects including nails, wire mesh, and a metal rod were found in three Division 2 cable trays located in the Unit 1 and 2 cable spreading rooms.

## RESPONSE

### Corrective Action Taken and Results Achieved

The Station Maintenance Department has initiated actions to formulate and implement a comprehensive plan for Unit 1 cable tray cleanliness inspection and any necessary cleaning. In early April, Project Construction Department/Howard P. Foley Company started a final inspection and cleanup effort for the Unit 2 cable tray. Additionally, cable pan cleanliness inspections and necessary cleaning operations are ongoing for both units.

### Corrective Action Taken To Avoid Further Noncompliance

Commonwealth Edison Company/Howard P. Foley Company have increased the cable pan cleanliness surveillance frequency for Unit 2. Additionally, Unit 2 Area Walkdown activities include cable pan cleanliness as one of the inspection aspects. Station Maintenance Department operating procedures are being reviewed to identify any additional actions necessary to ensure Unit 1 and future Unit 2 cable pan cleanliness. Lastly, the Site Project Construction Superintendent issued a letter (DSL #536) to Commonwealth Edison and contractor employees regarding plant cleanliness.

### Date When Full Compliance Will Be Achieved

The Units 1 and 2 cable pan inspection/cleaning operation are ongoing. Unit 2 area walkdowns and turnovers will be complete prior to Unit 2 fuel load. Station Maintenance Department programmatic reviews and corrective actions will be complete by September 17, 1983.