



Commonwealth Edison

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June 14, 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 Unit 2
Response to Inspection Report
No. 50-374/84-04
NRC Docket No. 50-374

Reference (a): W. S. Little letter to Cordell Reed
dated April 24, 1984.

(b): D. L. Farrar letter to J. G. Keppler
dated May 22, 1984.

Dear Mr. Keppler:

This letter supplements the response to the inspection conducted by Mr. Z. Falevits on January 31 through February 13, 1984, of activities at LaSalle County Station transmitted by reference (a). The timing for submittal of this supplement was discussed with Mr. Cordell Williams of your staff on June 14, 1984.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

D. L. Farrar
Director Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT A

COMMONWEALTH EDISON COMPANY LASALLE COUNTY STATION UNIT 2 SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION

NONCOMPLIANCE

10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Company Corporate Quality Assurance Manual, Nuclear Generating Stations, Section 5, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, the following examples of inadequate implementation of procedures were identified.

1. Procedure LAP-810-5 Revision 9, requires that drawings be checked against Sargent and Lundy status list quarterly to assure that up to date drawings are being maintained in the central file.

No documented evidence could be found to indicate that any checks have been performed in the last two years. One aperture hard copy print (No. M-5444, Sh. 2) made from central file records, did not contain any engineering approval signatures and did not identify the current revision status of the drawing.

- 2.c. Indicating control light arrangements on drawings do not agree with the arrangements on the panel. (Drawing series/E-1-4497 AA-AD and 1E-2-4498 AA-AD.)

ITEM 1

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

On February 23 & 24, 1984 a drawing audit was performed on Sargent & Lundy Electrical, Mechanical, Structural and Architectural drawings. Of the 29,348 drawings audited, 252 were missing from the file and 133 had the wrong revision. The 133 drawings with the wrong revision were pulled from the file. The drawings identified as missing/wrong revision during the audit were requested from Drawing Management Services and a commitment was made for Sargent & Lundy to have all the drawings to Drawing Management Services by June 15, 1984.

The aperture card (M-5444, Sheet 2) identified as not containing engineering approval signatures and not identifying the current revision status was corrected prior to the exit. The revision now in Central File is the A revision dated June 15, 1977 and contained the required engineering approvals, this revision is the current revision per the Sargent and Lundy print index.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

To assure quarterly auditing of the drawing files, the item has been put on the General Surveillance Program. Documentation will be maintained on all future audits. Station procedure LAP-810-5 has also been revised to clarify the quarterly sample audit requirements for the drawing files.

DATE OF FULL COMPLIANCE

June 15, 1984.

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ATTACHMENT B

Additional Information Regarding Item 2.C
Of the Notice of Violation dated April 24, 1984

The indicating control light arrangements shown on LaSalle County Station drawings reflect standard drawing conventions developed by Sargent & Lundy and Commonwealth Edison. These specify red lights to indicate full open valves, green lights to indicate full closed valves, etc. Subsequent to development of these drawing standards and issuance of the majority of station drawings, LaSalle implemented a "green board" program. This program is aimed at reducing operator errors by creating control room panel indications which are more meaningful to the operator. Under this concept, a valve in its normal position will be shown in green regardless of its position. An off normal valve will be shown in red, calling the attention of the operator to the abnormal line-up. Implementation of the "green board" concept has been a significant improvement from a human factors standpoint. Operator training and participation in the actual setup of control panels for green board has served to familiarize them with this concept. Thus Commonwealth Edison believes this minor discrepancy between the drawings and panels is not likely to result in confusion. We also believe that revision of these drawings to reflect green board would contribute little to plant safety or reliability. We believe the large effort in manpower both at the site and at our A.E., plus the significant cost associated with revising these drawings is not justified.