



**Commonwealth Edison**

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July 31, 1984

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

Subject: LaSalle County Station Unit 2  
Response to Inspection Report  
No. 50-374/84-23  
NRC Docket No. 50-374

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. M. J. Jordan on June 6 through June 22, 1984, of activities at LaSalle County Station Unit 2. 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.

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

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT

COMMONWEALTH EDISON COMPANY

LASALLE UNIT 2

RESPONSE TO NOTICE OF VIOLATION

ITEM OF NONCOMPLIANCE

Technical Specification 3.3.2.c states that with the number of operable channels less than required by Table 3.3.2.-2 per trip system for both trip systems, place at least one trip system in the tripped condition within one hour, close the isolation valves within one hour and declare the affected system inoperable.

Contrary to the above, both trip systems for the Reactor Water Cleanup System had the trip functions for high differential flow, high heat exchanger area temperature, high heat exchanger area ventilation differential temperature, high pump area temperature, and high pump area ventilation differential temperature bypassed such that both trip systems did not have the required operable channels for 7.5 hours, and the isolation valves remained open with neither trip system tripped.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Both channels had been taken to bypass at about 0735 for area temperature monitoring. At about 1455, the relieving licensed operator discovered both channel test switches to still be in bypass, and brought this to the attention of the Shift Control Room Engineer (SCRE), and the Shift Engineer. All testing was immediately terminated and both trip channels returned to normal. In order to complete a temperature trip channel calibration surveillance which was being performed at the time, one key was then issued to a Control Systems Technician, and the surveillance was satisfactorily completed at approximately 1630.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

- 1) The importance of complete communication with all personnel involved in any evolution was emphasized to the SCRE involved during a coaching interview.
- 2) The surveillance procedure being performed at the time of the occurrence was revised to identify the Technical Specification Requirements/Limitations for bypassing the Trip Channels involved.

- 3) The occurrence was reviewed with the Instrument Mechanics, SCRE's and all Operating crews.
- 4) The occurrence was reviewed with all Technical Staff personnel, and the importance of being aware of Technical Specifications that impact upon their activities in the plant was stressed.
- 5) A letter from the Assistant Superintendent of Operating was sent to all Shift Engineers and SCRE's which presented guidelines, actions, and responsibilities for maintaining Technical Specification timeclocks during the performance of surveillances, routine procedures, and special testing of RPS, PCIS, ECCS, ATWS, RCIC, and RPT systems.
- 6) An efficient method of tracking Technical Specification timeclocks associated with surveillances will be researched for incorporation into plant routines.

DATE OF FULL COMPLIANCE

Items one through five are now complete. Item 6 is schedule for completion by November 15, 1984. Full compliance will be achieved at that time.