



Commonwealth Edison
LaSalle County Nuclear Station
2601 N. 21st. Rd.
Marseilles, Illinois 61341
Telephone 815/357-6761

November 13, 1992

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Dear Sir:

Licensee Event Report #92-011-00, Docket #050-373 is being submitted to your office in accordance with 10CFR50.73(a)(2)(i).

G. J. Diederich
Station Manager
LaSalle County Station

GJD/JL/mkl

Enclosure

xc: Nuclear Licensing Administrator
NRC Resident Inspector
NRC Region III Administrator
INPO - Records Center
IDNS Resident Inspector

160054

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PDR ADDCK 05000373
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JE271/

Form Rev 2.0

Wrong High Radiation Door Downgraded Due To Personnel Error

OPERATING MODE (9)		5		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)			
POWER LEVEL (10)	0	0	0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
				20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
				20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	<input checked="" type="checkbox"/> Other (Specify
				20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	in Abstract
				20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	below and in
			20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	Text)	

Name	TELEPHONE NUMBER											
	AREA CODE											
Joe Lewis, Radiation Protection, Extension 2237	8	1	5		3	5	7	-	6	7	6	1

CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS	
A	S	F		N							

Yes (If yes, complete EXPECTED SUBMISSION DATE)	1. NO	Submission Date (15)							
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On October 15, 1992 Unit 1 was in Operational Condition 5 (Refuel) at 0% power. At approximately 1674 hours a Radiation Protection Shift Supervisor (RPSS #2) called the Station Radiation Protection Office to confirm that the entry door (#138) to the Unit 1 A/B/C Condensate Polisher (CP) Vessel Room had been downposted from a "High Radiation Area" to a "Radiation Area". The door access card reader was also to have been downgraded to a production level access status to facilitate work inside the A/B/C CP Vessel Room. The Duty Radiation Protection Shift Supervisor (RPSS #1) indicated that door 136 had been downgraded and posted as a "Radiation Area". Door 136 controls access to the Unit 1 D/E/F/G CP Vessel Room. The resulting loss of control of a High Radiation Area is a violation of Technical Specification 6.1.1. The change in posting is a violation of 10CFR20.203(c)(1). Door 136 was properly posted and controlled at 1655 hours on October 15, 1992. The apparent cause of this event was a personnel error resulting from the initial typing of the door list utilized by the Radiation Protection Department. The door numbers and descriptions for the two Unit 1 CP Vessel Rooms had been reversed. A review of the computer generated access log shows no unauthorized attempts to gain access to the D/E/F/G CP Vessel Room during the time period the door was downgraded and downposted.

Physical control of door 136 was established at approximately 1628 hours. Door 136 was properly posted and electronically controlled at 1655 hours. The High Radiation Door Computer Data Base and the typed High Radiation Door List were removed from service pending a review of all door numbers and associated written descriptions. A Stop Work Order was placed on the Radiation Work Permit for the Unit 1 A/B/C CP Vessel Room as a precaution. A survey of the Unit 1 D/F/F/G CP Vessel Room was performed. Radiation Protection Personnel were tailgated regarding the event on the morning of October 16, 1992.

This report is being submitted in accordance with 10CFR50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specification.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						Page (3)		
		Year	Sequential Number	Revision Number						
LaSalle County Station Unit 1	0 5 0 0 0 3 7 3	9 2	- 0 1 1	-	0 1 0	0 2	OF	0 4		

TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

A. CONDITION PRIOR TO EVENT

Unit(s): 1 Event Date: 10/15/92 Event Time: 1345 Hours

Reactor Mode(s): 5 Mode(s) Name: Refuel Power Level(s): 0%

B. DESCRIPTION OF EVENT

On October 15, 1992 Unit 1 was in Operational Condition 5 (refuel) at 0% power. At approximately 1340 hours a member of the Station (Radiation) As Low As Reasonably Achievable (ALARA) Group requested the Unit 1 A, B, C Condensate Polisher (CP) [SF] Vessel Room be downposted from a High Radiation Area to a Radiation Area. Surveys of the room taken on October 14, 1992 at 1900 hours and on October 15, 1992 at 1000 hours supported the request. The access control card reader was also to have been downgraded to a production level access status to facilitate work inside the A/B/C CP Vessel Room.

The Duty Radiation Protection Shift Supervisor (RPSS) has the responsibility for the performance of status level changes to doors controlling access to areas for radiological purposes in the plant. In that capacity, RPSS #1 obtained the Unit 1 A/B/C CP Vessel Door Number (136) from the hardcopy High Radiation Area door listing and complied with the request to downpost the door and to downgrade the access card reader. The changes were accomplished at 1345 hours on October 15, 1992.

At the Construction Radiation Protection Work Control Station, at about 1610 hours, a second RPSS (RPSS #2) met with workers to discuss entry to the Unit 1 A/B/C CP Vessel Room. RPSS #2 was aware of the potential for confusion regarding entry to the correct room. He questioned the workers at length and discussed the work location emphasizing the need to enter the correct room several times. RPSS #2 specified the door number as 138 and noted the door number in the Radiation Work Permit (RWP) controlling the work. Specifying the door number in the RWP would ensure subsequent entries would be to the proper room. Door number 138 had been obtained by RPSS #2 through visual observation. The workers read and signed the RWP and left to prepare for their entry at about 1620 hours.

At about 1625 hours RPSS #2 called the Duty RPSS. There had been a shift relief and RPSS #3 was the Duty RPSS. RPSS #2 called to verify that door 138 to the Unit 1 A/B/C CP Vessel Room had been downgraded and downposted. RPSS #3 indicated that documentation existed for a status change to door 136 but not for door 138.

RPSS #2 immediately recognized a conflict, crossed out door number 138 in the RWP to avoid possible confusion, and reported to the CP Vessel Room where doors 136 and 138 are located. RPSS #2 took physical control of access to both doors at about 1628 hours. He tested door 136 which controls access to the Unit 1 D/E/F/G CP Vessel Room. The test verified the card reader access to be downgraded. This is a violation of Technical Specification 6.1.1.2. He also verified the posting to be Caution Radiation Area. This is a violation of the posting requirements in 10CFR20.203(c)(1).

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LaSalle County Station Unit 1	0 5 0 0 0 3 7 3	9 2	-	0 1 1	-	0 0	0 3	OF	0 4	

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B. DESCRIPTION OF EVENT CONTINUED

This report is being submitted in accordance with 10CFR50.73(a)(2)(i), any operation or condition prohibited by the Plants Technical Specifications.

RPSS #2 had the posting and the card reader returned to their original status prior to the event. He maintained control of access to the area until the proper control and posting were verified at 1655 hours.

C. APPARENT CAUSE OF EVENT

The apparent cause of this event was a personnel error resulting from the initial typing of the High Radiation Area Door List utilized by the Radiation Protection Department as a reference. The door numbers for the two Unit 1 CP Vessel Rooms with descriptions had been reversed.

D. SAFETY ANALYSIS OF EVENT

The safety consequences of this event were minimal. RPSS #2 as the cognizant Radiation Protection Manager was fully aware of the correct door number (138) for work that was to have been performed in the Unit 1 A/B/C CP Vessel Room. Workers preparing for the Unit 1 A/B/C CP Vessel Room work had been given detailed information regarding the location of door 138 and were unlikely to have attempted access through door 136 to the Unit 1 D/E/F/G CP Vessel Room. A card reader history for door 136 showed no unauthorized attempts to enter the room during the time the door was incorrectly downgraded.

E. CORRECTIVE ACTIONS

Immediate corrective action was taken by RPSS #2 and physical control of door 136 was established at approximately 1628 hours. Door 136 was properly posted and electronically controlled at 1655 hours.

The High Radiation Door Computer Data Base (RAD DOOR) and the typed High Radiation Door List were removed from service pending a review of all door numbers and associated written descriptions.

Action Item Record (AIR) 373-180-S2-08201 will track completion of this review.

A Stop Work Order was placed on the Radiation Work Permit for the Unit 1 A/B/C Vessel Room until the day shift on October 16, 1992 as a precaution.

Radiation Protection Personnel were tailgated regarding the event on the morning of October 16, 1992.

The Radiation Protection Department will evaluate placing door numbers on appropriate survey forms. The survey forms would then be made part of the documentation required for each High Radiation Area door status change prior to the status change being made. AIR 373-180-92-08202 will track completion of this evaluation.

Station procedure LAP-1100-13 Attachment B, which is used to document High Radiation Area door status changes, will be revised to include both door number and description of the affected door. Current requirements include only the door number. AIR 373-180-92-08203 will track these procedure changes.

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E. CORRECTIVE ACTIONS CONTINUED

A review was performed to identify areas where similar problems could exist with respect to activities within the Radiation Protection Department. As a result the plant routine survey checklist is being reviewed to ensure compliance with Chapter 12 of the UFSAR. No other areas of concern were identified.

F. PREVIOUS EVENTS

LER Number	Title
373/84-042-00	Hi Rad Door Unsecured And Unposted/Lack Of Management Communication
373/84-079-00	Hi Rad Door Open And Not Posted/Cancelled Guard Post On Wrong Door
374/84-034-00	Hi Rad Door Unsecured And Unposted/Lack Of Management Communication
374/84-049-00	Hi Rad Door Unsecured/Status Level In Security Computer Wrong

G. COMPONENT FAILURE DATA

There were no component failure.

EVENT SUMMARY AND CAUSE CODES

DVR Number

01-1-92-032

<input type="checkbox"/> Lost generation	<input type="checkbox"/> Reactor trip	<input type="checkbox"/> NRC violation, level
<input type="checkbox"/> Cost > \$25,000	<input type="checkbox"/> ESF actuation	<input type="checkbox"/> GSEP event, class
<input type="checkbox"/> Hazard or Spill	<input type="checkbox"/> NRC reportable	<input type="checkbox"/> Tech Spec LCO
<input type="checkbox"/> Personnel injury	<input type="checkbox"/> LER	<input type="checkbox"/> Potential or future lo
<input type="checkbox"/> Component type	<input type="checkbox"/> PSE	<input type="checkbox"/> SALP functional area
	Failure mode	

Department			
X			
X			
X			

Licensed? L or blank	Type	Level	Department	Detail code
A	I	S	R	P
A				
A				

Type	Detail Code	Department
B		
B		
B		

Type	Detail code
C	

Type of deficiency	Detail code	Procedure type
D		
D		
D		

Type	Detail code	Department
E		
E		
E		