

NOTICE OF VIOLATION

Commonwealth Edison Company
LaSalle County Station, Units 1 and 2

Docket Nos. 50-373; 50-374
License Nos. NPF-11; NPF-18

During an NRC inspection conducted on October 14 through November 25, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violations are listed below:

1. LaSalle Technical Specification 6.2.A.1 requires, in part, that detailed written procedures covering items in Regulatory Guide 1.33, Appendix A, Revision 2, be prepared, approved, and adhered to. Regulatory Guide 1.33 lists procedures for preparation for refueling and refueling equipment operation, the reactor water cleanup (RWCU) system, and the liquid radioactive waste system.

Contrary to the above, procedures for preparation for refueling and refueling equipment operation, the RWCU system, and the liquid radioactive waste system were not adhered to in the following examples:

- a. On October 29, 1992, RWCU system downstream resin drain stop valves, 2G33-Z001-43A and 2G33-Z001-42A were not sufficiently closed prior to returning a filter demineralizer to service in accordance with LaSalle Operating Procedure (LOP)-RT-06, "Reactor Water Cleanup System Filter/Demineralizer Precoat," steps F.15.a.2, F.15.a.4, and F.15.b.
- b. On November 21, 1992, a radioactive waste system operator failed to verify proper flow line-up in accordance with LOP-WZ-03, "Chemical Waste Collector Tank Transfer To Chemical Waste Process Tank And Vice Versa", step F.5.
- c. On October 25, 1992, a fuel handler failed to fully raise the grapple, check the digital height indicator, or verify receipt of the "Normal Up Limit" light in accordance with LFP-400-1, "Fuel Movements Within the Reactor and Spent Fuel Storage Pools," step F.1.n.
- d. On October 23, 1992, a licensee contract fuel handler failed to properly verify steps on the Nuclear Component Transfer List in accordance with LaSalle Fuel Procedure (LFP)-100-2, "Administrative Control of Transfer Of Fuel Or Special Nuclear Material Between Or Within the Spent Fuel Pool(s) Or Vaults", step F. 3.

This is a Severity Level IV violation (Supplement 1).

2. 10 CFR 50, Appendix B, Criterion XIV, as implemented by Regulatory Guide 1.33, Revision 2, which endorses ANSI N.18.7-1976 requires prior to granting permission for release of equipment, operating personnel shall verify that the equipment can be released, determine how long it may be out-of-service, and to document such granting of permission.

Contrary to the above, LaSalle Administrative Procedure (LAP)-900-4, "Equipment Out-Of-Service Procedure," Revision 48, did not require operating personnel to verify that equipment can be released or to document such granting of permission. These actions were not taken for out-of-service 2-2202-92.

This is a Severity Level IV violation (Supplement 1).

3. 10 CFR 50, Appendix 8, Criterion V requires, in part, activities affecting quality be prescribed by documented procedures of a type appropriate to the circumstances.

Contrary to the above, procedures were inappropriate to the circumstances in the following examples:

- a. LaSalle Electrical Surveillance (LES)-RD-102, "Unit 1 Alternate Rod Insertion Division 1 Logic Functional Test," Revision 1, did not delineate a specific applicable step sequence. This resulted in a reactor scram on October 9, 1992, when the control rod charging water header supply stop valve was improperly closed prior to taking the mode switch to the shutdown position.
- b. LaSalle Technical Surveillance (LTS)-100-11, "Feedwater Outboard Stop and RWCU Return Valves Local Leak Rate Test," Revision 8, failed to take into account that a check valve between the RWCU discharge valve 1G33-F040 and the required vent path would invalidate the results of the test.
- c. LaSalle Limited Procedure (LLP)-92-159, "Alternate Method For Performing Channel Check Of VC Intake Radiation Monitors," Revision 0, failed to specify that a greater than two second delay between returning the monitor switch to the "OPERATE" position and depressing the red trip light would cause the actuation circuitry to seal-in. This resulted in an unplanned control room emergency ventilation actuation on October 16, 1992.


This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555, with a copy to the U.S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, and a copy to the NRC Resident Inspector at the LaSalle County Station within 30 days of the date of the

letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation " and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Glen Ellyn, Illinois
this 4th day of Dec. 1992


Edward G. Greenman, Director
Division of Reactor Projects