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September 27, 1985

Docket Nos. 50-373 and 50-374
License Nos. NPF-11 and NPF-18
EA 85-95

Commonwealth Edison Company
ATTN: Mr. James J. O'Connor
President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

Subject: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTIES
(NRC INSPECTION REPORT NOS. 50-373/85023 and 50-374/85018)

This refers to the inspections conducted during the period June 10 - July 24, 1985 of activities authorized by NRC Operating License Nos. NPF-11 and NPF-18 for the LaSalle County Nuclear Power Station, Units 1 and 2. The inspections were conducted after the NRC Resident Inspector was informed on June 10, 1985 that your staff identified that Unit 2 was without Emergency Core Cooling capability for approximately five days and that the plant had been without secondary containment integrity for approximately three days during this same period. This matter was discussed on June 24, 1985 during an Enforcement Conference held at the LaSalle County Nuclear Power Station between Mr. B. L. Thomas and other members of your staff and myself and other members of the NRC staff.

Item I described in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty involves loss of the automatic initiation capability of the Emergency Core Cooling System (ECCS) in response to a low-low-low reactor vessel water level signal between June 5-10, 1985 while Unit 2 was in cold shutdown. The violation resulted from the failure of your staff to ensure that modifications performed on safety-related systems were adequately controlled so that system operability was not jeopardized. In addition, from 3:30 a.m. on June 5 until 5:30 p.m. on June 8, 1985, secondary containment was neither established nor maintained as required by the Technical Specifications when Emergency Core Cooling capability is lost. The circumstances leading to the violations are described below.

Division III of the ECCS was removed from service in March 1985 for normal maintenance. Between April and June 1985, due to inadequate controls in the design, inspection, and testing areas, the piping to two reactor vessel water level actuation switches in Division I of the Unit 2 Emergency Core Cooling System (ECCS) was installed backwards and, as a result, the Division I ECCS

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pumps would not have initiated as required on a low-low-low reactor vessel water level trip signal. At 3:30 a.m. on June 5, 1985, while unaware that Division I was inoperable, you removed Division II of the ECCS from service. Since you had removed Division III from service in March 1985, the three ECCS divisions were inoperable and automatic initiation capability of the ECCS in response to a low-low-low reactor vessel water level signal was lost until the problem was discovered and corrected on June 10, 1985. The cause of this event was the lack of adequate design document, inspection, and testing controls in your modification program.

While we recognize that when these violations occurred LaSalle Unit 2 was in cold shutdown, we consider this violation particularly significant because of its similarity to a violation identified in April and for which you were cited in July and to several other recent events for which violations are cited in the enclosed Notice. On April 17, 1985, while performing monthly functional tests on LaSalle Unit 1, your staff determined that two switches for the Unit 1 Automatic Depressurization System (ADS) were miswired, making the trip system "B" for ADS initiation inoperable. This matter was discussed with you during a May 28, 1985 Enforcement Conference, and a Notice of Violation was sent to you on July 18, 1985 for inadequacies in your design and test controls (Reference NRC Inspection Reports 50-373/85017 and 50-374/85017). The causes of the ADS problem were almost identical to the causes of the Unit 2 ECCS problem, even though the trip system "A" for ADS initiation was wired correctly and would have been able to initiate if required.

Item II involves your discovery on July 17, 1985 that the piping to your Unit 1 Regenerative Heat Removal (RHR) shutdown cooling pump high suction flow alarm and isolation switches was installed backwards. A verification walkdown failed to identify this improper installation. This installation resulted in these switches being inoperable during power operation, and a Technical Specification Limiting Condition for Operation was exceeded. Although there are several redundant signals that may provide this same system isolation function, this violation demonstrates other examples of the lack of adequate design document and testing controls in your program.

Item III involves another instance where the piping to the two Unit 2 RHR Shutdown Cooling pump suction high flow isolation switches was installed backwards. Your staff failed to recognize this improper installation during a verification walkdown, but after a review of data associated with an alternate test, identified the problem with the installation of the lines to the switches. Although we recognize the Technical Specification does not require these switches to be operable in cold shutdown, this violation demonstrates further design and testing failures in your modification program.

These violations also demonstrate a need for you to re-examine your commitments made to the NRC with regard to operability testing. On October 30, 1984, the LaSalle plant failed to perform adequate tests on the Standby Gas Treatment System (SBGT) after maintenance work was performed. As a result, plant personnel were not aware that the SBGT was inoperable until the problem was brought to their attention by the NRC Resident Inspector. That event resulted in a recent \$25,000 civil penalty. In the April 19, 1985 response to this civil penalty action, Commonwealth Edison Company stated, "In order to preclude this type of problem in the future, LaSalle Station will require that a test be conducted to demonstrate operability anytime a safety-related system is returned to service. A Post Maintenance Operational Test Checklist has been developed to ensure that the post maintenance test specified adequately demonstrates system operability in light of work performed." The violations cited in this Notice indicate that more effective controls must be implemented to ensure that operability tests will be performed on safety-related systems after maintenance or modification and before these systems are returned to service.

To emphasize the need for you to ensure that modifications performed on safety-related systems have adequate controls so that system operability is not jeopardized, and to ensure that an effective program for performing operability tests is implemented, I have been authorized, after consultation with the Director, Office of Inspection and Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalties in the cumulative amount of One Hundred and Twenty-five Thousand Dollars (\$125,000) for the violations described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations described in the enclosed Notice have been categorized collectively as a Severity Level III problem. The base civil penalty for a Severity Level III problem is \$50,000. However, after considering the escalation and mitigation factors in the Enforcement Policy, the base civil penalty has been increased by 150 percent because of the multiple examples of the particular violations and your prior poor performance in the area of concern.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional action you plan to prevent recurrence. After reviewing your response to this Notice, including your corrective actions, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

September 27, 1985

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

Enclosures:

1. Notice of Violation
and Proposed Imposition
of Civil Penalties
2. Inspection Reports
No. 50-373/85023(DRP)
No. 50-374/85018(DRP)

cc w/enclosures:

- D. L. Farrar, Director
of Nuclear Licensing
G. J. Diederick, Station
Superintendent

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gm
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General's Office Environmental

Control Division