

Public IE-01

December 9, 1996

Mr. W. T. Subalusky, Jr.  
Site Vice President  
LaSalle County Station  
Commonwealth Edison Company  
2601 North 21st Road  
Marseilles, IL 61341

SUBJECT: NRC INSPECTION REPORT 50-373/96016(DRP); 50-374/96016(DRP)  
AND NOTICE OF VIOLATION

Dear Mr. Subalusky:

From October 1 through October 8, 1996, the NRC performed a special team inspection at your LaSalle facility. The enclosed report presents the results of that inspection.

Based on the results of this inspection, the NRC has determined that a violation of NRC requirements occurred. This violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report.

This report documents two examples of inattention to detail on the part of licensed senior reactor operators (SROs) while preparing and reviewing work packages for the removal of safety related equipment from service (OOS program), and an example of a misinterpretation of a Technical Specification (TS) time clock. A non-cited violation of your TSs resulted from the first example of a poorly prepared and reviewed OOS. This condition was complicated because your on-duty operators misinterpreted the application of the TS time clock. As a result of the second OOS problem, you made an unplanned entry into a TS action statement. This condition was not recognized for several days, and your compliance with the action statement was fortuitous. The inspectors independently identified that a portion of your policy for OOSs related to emergency diesel generator (EDG) work was not formally documented. Collectively, these issues appeared to be indicative of a need for improved human performance and additional management attention. Our preliminary assessment was that your corrective actions were effective.

The inspectors concluded that your staff identified a potentially generic concern with WKM Model 70-13 Air Operated Valve (AOV) actuators as the result of a thorough and proactive preventive maintenance program. Although the technical resolution to the as-found condition was diligently pursued, your staff failed to document the non-conformance and perform an operability determination as specified in your plant procedures. The inspectors considered this to be a violation of 10 CFR 50, Appendix B, Criterion V, because of the use of the effected AOVs in the Primary Containment Isolation System (PCIS). Our concern over this level of performance was heightened by the inspector's identification of a potential weakness in your program for implementation of established NRC guidance on operability determinations.

9612240014 961209  
PDR ADDCK 05000373  
Q PDR

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 actions you plan to prevent recurrence. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practices," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR).

Sincerely,

/s/ John A. Grobe

James L. Caldwell, Acting Director  
Division of Reactor Projects

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

Enclosures:

1. Notice of Violation
2. Inspection Reports  
No. 50-373/96016(DRP);  
No. 50-374/96016(DRP)

DOCUMENT NAME: R:INSPRPTS\POWERS\LASA\LAS96016

To receive a copy of this document, indicate in the box "C" = Copy w/o attach/encl "E" = Copy w/attach/encl "N" = No copy

OFFICE	DRP <i>DRP</i>	<i>C</i>	DRS		DRP <i>DRP</i>		
NAME	Jorgensen/sn		Kropp <i>WK</i>		Caldwell/Grobe		
DATE	10/23/96		10/14/96		10/9/96		

OFFICIAL RECORD COPY

cc w/encl: T. J. Mairman, Senior Vice President  
Nuclear Operations Division  
D. A. Sager, Vice President,  
Generation Support  
H. W. Keiser, Chief Nuclear  
Operating Officer  
D. J. Ray, Station Manager  
J. Burns, Regulatory Assurance  
Supervisor  
I. Johnson, Acting Nuclear  
Regulatory Services Manager  
Richard Hubbard  
Nathan Schloss, Economist  
Office of the Attorney General  
State Liaison Officer  
Chairman, Illinois Commerce  
Commission  
Document Control Desk-Licensing

Distribution:

Docket File w/encl  
PUBLIC IE-01 w/encl  
OC/LFDCB w/encl  
CAA1 w/encl (E-mail)  
Project Manager, NRR w/encl  
RAC1 (E-Mail)  
B. L. Burgess, w/encl

DRP w/encl  
RIII PRR w/encl  
SRI LaSalle, Dresden,  
Quad Cities w/encl  
A. B. Beach, w/encl  
W. L. Axelson, w/encl