



**Commonwealth Edison**

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August 6, 1985

Mr. James G. Keppler  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road - Region III  
Glen Ellyn, Il. 60137

Subject: LaSalle County Station Unit 2  
Response to Inspection Report  
No. 50-374/85-020  
NRC Docket No. 50-374

Reference (a): R. L. Spessard letter to Cordell Reed  
dated July 23, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. S. DuPont and H. Walker on June 24-28 and July 1-2, 1985 of activities at LaSalle County Station Unit 2. Reference (a) identified certain activities associated with our modification program that were considered to be unresolved items. The Commonwealth Edison Company's response to the unresolved items is provided in the attachment.

If you have any further questions regarding this matter, please direct them to this office.

Very truly yours,

*for M.S. Turbak*  
L. O. DelGeorge  
Assistant Vice President

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT

RESPONSE TO UNRESOLVED ITEMS

1. UNRESOLVED ITEM 374/85020-01

"During the review of modification M01-2-84-146 concerning the upgrading of radiation detectors 2D18-N009 and 2D18-N015 to meet environmental qualifications, the inspector noted that the scope of the modification was changed at the site after engineering had approved the modification. A portion of the work was deleted from the modification and the work request for this work was cancelled. Another work request was subsequently issued for the removed portion of the original work and that removed portion was completed under this new work request.

This is an unresolved item pending further review by the licensee and Region III of site personnel changing the scope of engineering-approved modifications without the concurrence of engineering personnel (374/85020-01(DRS))."

RESPONSE

The Station practice is not to change the scope of any Modification without the approval of the original engineering organization. The review process is described in LaSalle Administrative Procedure, LAP 1300-2, "Plant Modifications".

Modification M1-2-84-146 directed the Station to provide for upgrading the Reactor Building Ventilation Radiation Detectors to a configuration which meets the requirements for environmentally qualified components. This modification consisted of installing thermal shields on the inside of the Ventilation Riser and verifying the model number of the radiation detectors.

The Engineering Approval letter for Modification M1-2-84-146 also included the additional direction to verify (via work request L40034) the Model number of the Fuel Pool Ventilation Radiation Detectors. This verification was not part of the scope of modification M1-2-84-146 and Work Request L40034 was cancelled. This process had been discussed previously with and agreed to by Station Nuclear Engineering, in that the verification of the model numbers was not a change to the facility in accordance with 10CFR50.59. The Fuel Pool Ventilation Radiation Detectors were verified via work request L45272 written January 10, 1985.

2. UNRESOLVED ITEM 374/85020-02:

"During the review of modification packages the inspector noted the following items:

- (1) Some modification packages were very large in scope and therefore difficult to control. Packages could be broken down into more practical scopes by grouping modifications by division or system, or by unit for each outage and by unit.
- (2) Since modifications are not signed off until all work is completed, the practice of including work for Units 1 and 2 in the same modification could result in a unit starting up and operating without the modification package being reviewed and approved until work on the other unit is completed.

This is an unresolved item pending further review by the licensee and Region III of licensee controls for the scopes of modification packages and the practice of combining Unit 1 and 2 work in the same modification packages (374/85020-02(DRS))."

RESPONSE:

The Station concurs that some modifications are large in scope and therefore difficult to control.

LaSalle Station is in the process of developing guidelines to be used for controlling the scope of modifications. The guidelines will address the magnitude of modifications and plant status. These guidelines are expected to be developed by August 16, 1985. The present backlog of modifications and future modifications will be reviewed against these guidelines.

3. UNRESOLVED ITEM 374/85020-03:

"During the review of Item 3 of CAL-RIII-85-07, the inspector noted that the post maintenance testing for work request L46699 required performance of calibration procedure LES-GM-119, "Calibration of 4KV emergency Bus Loss of Voltage Relays by O.A.D." The inspector's review of LES-GM-119 revealed that Operating Analysis Department (OAD) Procedure 3.2, "Periodic Relay Testing of Voltage Relays," is required to calibrate Technical Specification undervoltage relays. Procedure 3.2 did not require detailed steps or specify acceptance criteria. For example, Step 3 of the procedure states "Check the operating function of the relay (trip, permissive, interlock, etc.) observe the operation indicator." This step is vague in providing instructions and acceptance criteria for determining proper operating function.

In addition, the "as left" data recorded in the attachments to LES-GM-119 are vague in determining acceptance to Technical Specification requirements. This is demonstrated by the trip setpoint requirement of 2870 volts for relay 2427-AP041A which was compared to the "as left" value which was recorded as 82 volts. This value (82 volts) is acceptable because the Technical Specification value (2870 volts) is divided by 35 due to the tap setting from which the relay drop voltage was recorded. However, this mathematical manipulation is not described in either procedure.

This is an unresolved item pending further review by the licensee and Region III of the level of detail provided in procedures used to verify Technical Specification requirements (374/85020-03(DRS))."

RESPONSE:

OAD will review Procedures 3.1 and 3.2, as referenced in LES-GM-119, to address the specific concerns raised by the NRC. A report documenting the review including recommendations or planned corrective actions will be submitted to the Station Manager by September 2, 1985. At the same time the station will review LES-GM-119 regarding the same concerns. Resulting station procedure changes will be completed by September 23, 1985.

Company reviews regarding the level of detail provided in OAD procedures used to assist in the verification of Technical Specification requirements are in progress. LaSalle and OAD will be available for meetings with the Region to discuss the results of these reviews after September 23, 1985.