

NOTICE OF VIOLATION

Commonwealth Edison Company
LaSalle County Station
Units 1 and 2

Dockets No. 50-373; 50-374
Licenses No. NPF-11, NPF-18

During an NRC inspection conducted on September 14 through October 25, and December 13, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. Technical Specification 6.2.A.a requires that applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established, implemented, and maintained.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, specifies procedures for plant shutdown, procedure adherence and temporary change methods, and maintenance that can affect the performance of safety-related equipment.

LaSalle General Procedure LGP-2-1, "Normal Unit Shutdown," Revision 48, Step 7, requires operators to downshift the reactor recirculation (RR) pumps to slow speed per LaSalle Operating Procedure LOP-RR-08, "Changing Recirculation Pump Speed from Fast to Slow Speed."

LaSalle Administrative Procedure LAP-100-40, "Procedure Use and Adherence Expectations," Revision 6, requires that a temporary procedure change be completed and the procedure revised when the change is more than an editorial change and the procedure cannot be performed as written.

LaSalle Maintenance Procedure LMP-GM-25, "Emergency Core Cooling System Service Water Strainer Maintenance," Revision 4, Step F.4.25, requires that workers ensure that the exposed faces of the shear key collar and the drive shaft which contact the inner and outer thrust bearing faces of the strainer backwash valve, are flush with each other. If these faces are not flush, the procedure directs the worker to install a spacer.

Contrary to the above, applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, were not correctly implemented in the following instances:

- a. On September 22, 1996, operators did not downshift the Unit 2 RR pumps to slow speed per LOP-RR-08 as required by LGP-2-1. Instead, operators downshifted the RR pumps per LaSalle Instrument Surveillance procedure LIS-RR-205A, "Unit Recirculation Pump Trip System A Breaker Arc Suppression Response Time Test," Revision 2, without first completing a temporary procedure change to LGP-2-1 as required by LAP-100-40.

- b. On October 2, 1996, during work on the 0 emergency diesel generator (EDG) cooling water strainer, workers did not ensure that the exposed faces of the shear key collar and the drive shaft which contact the inner and outer thrust bearing faces of the strainer backwash valve, were flush with each other, and did not install a spacer as required by LMP-GM-25.

This is a Severity Level IV violation (Supplement I) (50-373/96013-02; 50-374/96013-02).

- 2. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, or drawings.

Out-of-service (OOS) 960012473 special instructions dated October 11, 1996, specified that the Unit 2, Division 2 battery charger be shut down in accordance with LOP-DC-01, "Energizing, Startup, and Shutdown of a Battery Charger," Revision 8, Step F.3.

Work request (WR) 940061754-01, "Install/Remove 2B Reactor Recirculation Loop Jet Pump Plugs to Support 67B Work," instructions specified that jet pump plugs be installed in jet pumps 11 through 20.

Contrary to the above, activities affecting quality were not accomplished in accordance with instructions in the following instances:

- a. On October 12, 1996, equipment operators shut down the Unit 1, Division 2 battery charger instead of the Unit 2, Division 2 battery charger as specified in OOS 960012473 special instructions.
- b. On October 9, 1996, fuel handlers installed two jet pump plugs in jet pumps 1 and 2 instead of installing plugs in jet pumps 11 through 20 as specified in WR 940061754-01 instructions.

This is a Severity Level IV violation (Supplement I) (50-373/96013-03; 50-374/96013-03).

- 3. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, procedures affecting quality were not appropriate to the circumstances in the following instances:

- a. On October 10, 1996, LMP-GM-14, "Use of Freeze Jackets," Revision 4, dated July 1, 1992, did not provide workers with information on the lower temperature limit when establishing a freeze seal.
- b. Prior to October 24, 1996, LAP 1300-16, "Engineering Request," Revision 1, and LAP 1300-18, "Roadmap to Plant Design Changes," Revision 1, failed to provide sufficient controls to ensure timely completion of engineering work.

This is a Severity Level IV Violation (Supplement I) (50-373/96013-05; 50-374/96013-05).

4. Technical Specification 6.2.A.g requires that written procedures be established, implemented, and maintained for the fire protection program.

LaSalle Administrative Procedure LAP-900-10, "Fire Protection Procedure for Welding and Cutting," Revision 16, dated June 27, 1996, Step F.1.c, requires, in part, that areas where cutting and welding are in progress be kept clean and that all accumulation of trash, rags, etc., be removed.

Contrary to the above, on September 29, 1996, workers welding on the 0 EDG cooling water strainer did not keep the area clean, and the area contained several cloth rags, electrical cords, and plastic bags.

This is a Severity Level IV violation (Supplement I) (50-373/96013-06; 50-374/96013-06).

5. Technical Specification 6.2.B. requires that radiation control procedures be maintained, available to all station personnel, and adhered to.

LaSalle Radiation Procedure LRP-1490-1, "Construction of Radiologically Posted Areas and Step Off Pad Areas," Revision 13, dated January 12, 1996, Step F.2.d, requires that hoses, electrical cords, etc., which breach a contaminated area boundary, be taped or tied securely, or otherwise be secured where they exit the area.

LaSalle Radiation Procedure LRP-1410-2, "Minimal Protective Clothing," Revision 7, dated June 23, 1994, Step F.2, requires that minimal protective clothing requirements include cloth and rubber shoe covers and cloth and rubber gloves.

Contrary to the above, radiation control procedures were not adhered to in the following instances:

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- a. On October 7 and 11, 1996, hoses that breached a contaminated area boundary in the vicinity of the 2D heater drain (HD) pump room and the 2A HD pump room, respectively, were not taped or secured as required by LRP-1490-1.
- b. On October 10, 1996, a maintenance worker did not wear the proper minimal protective clothing specified in LRP-1410-2. The worker wore rubber-gloves and rubber shoe covers but did not have on cloth gloves or cloth shoe covers.

This is a Severity Level IV violation (Supplement I) (50-373/96013-09; 50-374/96013-09).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the LaSalle facility, 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. Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. 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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois
this 29th day of January 1997