

## 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 November 6-7, December 4, 1996, and January 3, 1997, two 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:

- A. 10 CFR 50, Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.

LAP 1300-14, "Minor Plant Change Procedure" and LAP 1300-2, "Modification Program," described the station process for performing modifications including the necessary safety screening evaluations.

Contrary to the above, the inspector determined that from late 1995 until October 1996 station minor modifications were performed on components and systems using Nuclear Design Information Transmittal (NDIT) forms rather than the process defined in LAP 1300-14. Some of these minor modifications did not have written safety screening evaluations which would have been required by LAP 1300-14 (NDITs LS-0144, ODG flange bolts; LS-0268, shutdown panel brackets; and LS-0438, control room sealing).

This is a Severity Level IV Violation (Supplement I).

3. Technical Specification 6.2, Plant Operating Procedures and Programs, states in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Appendix A, states that administrative procedures for procedure review and approval activities should be covered by written procedures.

Procedure LAP 820-2, "Station Procedure Preparation and Revision," Revision 39, Section B.1.3, states that all new procedures or revisions receive either a technical review or on-site review as specified in attachment LAP 820-2T. LAP 820-2T identifies that LAP 1300-14, "Minor Plant Change Procedure," requires an on-site review.

Contrary to the above, the LaSalle station site engineering department issued site appendix, NEP-12-03LA, "LaSalle Nuclear Design Information Transmittals (NDIT) Site Appendix," Revision 2, in October 1996 without the Appendix being processed in accordance with procedure LAP 820-2. NEP-12-03LA defined a different minor modification process than the one described in station procedure LAP 1300-14.

This is a Severity Level IV Violation (Supplement I).

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 14th day of February 1997