

November 20, 1996

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

SUBJECT: REVIEW OF AUGUST 20, 1996, ADMINISTRATIVE OVEREXPOSURE AND
RESULTS OF THE OCTOBER 15-18, 1996, RADIATION PROTECTION (RP)
INSPECTION

Dear Mr. Subalusky:

This refers to the inspection completed on October 18, 1996, at the LaSalle County Station. The purpose of the inspection was to review the circumstances surrounding an administrative overexposure which occurred on August 20, 1996, and to review radiological performance during the Unit 2 refueling outage (L2RO7). At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

This inspection identified a number of concerns associated with radiation protection performance. While the dose expended during refueling outage L2RO7 was reasonable considering the work scope, the radiological controls specified for certain jobs did not incorporate previous industry and/or site experience for similar jobs. For example, although the effects of incore irradiation of intermediate range monitors (IRMs) were disseminated in NRC Information Notice (IN) 88-63, this information was not adequately considered in preparation for the removal of IRMs on two separate occasions. Of greater concern is that your staff identified higher than anticipated dose rates during the first IRM removal, documented the problem in a low priority PIF and performed the second removal prior to developing corrective actions for the first event. This resulted in a violation for an inadequate evaluation of radiological conditions.

In addition, an administrative overexposure of an individual occurred. Of significance is that the individual received alarms on his electronic dosimeter but could not hear them due to high ambient noise levels. The inability of workers to hear ED alarms contributed to a previous administrative overexposure at LaSalle and could lead to events with higher safety significance. In this case, the radiation protection department was not made aware that the individual was located in the area which was a violation of procedural requirements.

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Based on the results of this inspection, the NRC has determined that violations of NRC requirements occurred concerning the failure to follow station procedures. The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. The violations are of concern, because they are a repetitive failure to follow RP requirements and are examples of inadequate communication to the RP group of ongoing work in radiological areas.

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 Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed Brent Clayton (for)

Geoffrey E. Grant, Director
Division of Reactor Safety

Docket Nos. 50-373; 50-374
Licenses No. NPF-11; NPF-18

Enclosures: 1. Notice of Violation
2. Inspection Reports No.
50-373/96014(DRS);
50-374/96014(DRS)

See Attached Distribution

(SEE PREVIOUS CONCURRENCE)

DOCUMENT NAME: G:\DRS\LAS96014.DRS

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practices," a copy of this letter; its enclosure; and your response, should you choose to submit one; will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without reaction.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Geoffrey E. Grant, Director
Division of Reactor Safety

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