

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-373/85027(DRS); 50-374/85028(DRS)

Docket Nos. 50-373; 50-374

License Nos. NPF-11; NPF-18

Licensee: Commonwealth Edison Company  
P. O. Box 767  
Chicago, Illinois 60690

Facility Name: LaSalle County Station, Units 1 & 2

Inspection At: LaSalle Site, Marseilles, Illinois

Inspection Conducted: August 19 - August 22, 1985

Inspector: *T. E. Taylor*  
T. E. Taylor

*9-4-85*  
Date

Approved By: *F. C. Hawkins*  
F. C. Hawkins, Chief  
Quality Assurance Programs Section

*9-4-85*  
Date

Inspection Summary

Inspection on August 19 - August 22, 1985 (Report Nos. 50-373/85027(DRS); 50-374/85028(DRS))

Areas Inspected: Routine, announced inspection relative to the implementation of Generic Letter (GL) 83-28 in the areas of equipment classification, vendor interface, post-maintenance testing, and reactor trip system reliability. Licensee actions on previous inspection findings were also reviewed. The inspection involved a total of 32 inspector-hours onsite.

Results: Of the four areas inspected, no violations or deviations were identified in three areas; one violation was identified in the remaining area (failure to perform activities affecting safety in accordance with documented instructions and procedures - Paragraph 5).

## DETAILS

### 1. Persons Contacted

#### Commonwealth Edison Company

- \*G. J. Diederich, Station Manager
- \*R. D. Bishop, Services Superintendent
- \*W. R. Huntington, Assistant Superintendent Operating
- \*W. E. Sheldon, Assistant Superintendent Maintenance
- \*P. F. Manning, Technical Staff Supervisor
- \*P. A. Welsh, Office Supervisor
- \*J. A. Ahlman, QA Engineer
- \*W. E. Grundmann, QA Engineer
- B. Westphal, Operations Engineer, Unit 2
- J. R. Kodrick, Maintenance Staff Engineer
- \*D. S. Berkman, Assistant Superintendent, Technical Services

#### USNRC

- A. D. Morrongiello, Resident Inspector (Quad Cities)

In addition, a number of other plant personnel were contacted.

\*Denotes those present at the exit interview on August 22, 1985.

### 2. Action on Previous Inspection Findings

- a. (Closed) Violation (373/84-32-05; 374/84-39-05): Preventive maintenance procedure LAP 300-4, "Lubrication and Preventive Maintenance Program," was not followed: approximately one-third of the safety-related lubrication activities listed on the November 23 through December 30, 1984, schedule were not performed within the specified time period. Through review of lubrication schedules and past due lubrication trending charts, the inspector determined that the licensee's lubrication preventive maintenance activities now met the requirements of LAP 300-4.
- b. (Closed) Open Item (373/84-32-06; 374/84-39-06): Making improper corrections to Quality Assurance records. Review of several quality assurance records showed no evidence of improper corrections to those documents. This item is considered closed.
- c. (Closed) Unresolved Item (373/84-32-07; 374/84-39-07): Documentation of post-maintenance testing. The inspector reviewed several work request packages relative to documentation of post-maintenance testing and determined it to be adequate.
- d. (Closed) Open Item (373/84-32-08; 374/84-39-08): Inadequate documentation of completed surveillance procedure steps. The

inspector reviewed several recently approved surveillance procedures and determined that the licensee's documentation of surveillance procedure steps is adequate.

3. Equipment Classification

Through review of procedures, discussions with licensee personnel, and review of records, the inspector determined that the licensee's programs for equipment classifications met the requirements of Generic Letter (GL) 83-28, Sections 2.1 and 2.2

The licensee's criteria and personnel responsibilities for classification of systems and components is described in SNED/DE Procedure No. D.12, "Classification and Listing of Safety-Related Items and ASME Section III Components." The inspector's review of several work requests, test date records, and procurement documents indicated no evidence of incorrectly classified components.

No violations or deviations were identified.

4. Vendor Interface

Through review of procedures and discussions with licensee personnel, the inspector determined that the licensee's administrative programs for vendor interface are adequate to meet the requirements of GL 83-28, Sections 2.1 and 2.2

The licensee's "Vendor Equipment Technical Information Program," (VETIP Procedure No. LAP 100-15) administratively controls vendor technical manuals and other vendor information. Implementation of VETIP is approximately 15 percent complete. Completion of implementing Procedure No. LAP 100-15 is considered an open item pending further NRC review (373/85027-01; 374/85028-01).

No violations or deviations were identified.

5. Post-Maintenance Testing

Through discussions with licensee personnel, review of administrative procedures, and review of completed work requests, the inspector determined that the licensee's program for post-maintenance testing met the requirements of GL 83-28, Sections 3.1 and 3.2.

While reviewing the post-maintenance testing documentation of Control Rod Drive Hydraulic Control Unit (HCU) No. 18-39 (work request L50479), the inspector determined that the procedural requirements of LAP-900-4, "Equipment Out-of-Service," had not been implemented for the HCU work activity. LAP 900-4 provides the administrative control for removing equipment from service, including tagging and verification of switch and valve positions. Licensee personnel stated that a "personnel out-of-service" control was used in lieu of LAP 900-4 for the HCU work activity. The "personnel out-of-service" control consists of

an operator stationed at the HCU who is in radio contact with the control room. This method of placing equipment out of service provides no documentation of the status of equipment following the work activity. In addition, LAP 900-4 states that when generating station equipment is taken out of service the use of LAP-900-4 is required. Also, procedures LOP-RD-08 ("CRD System HCU Isolation") and LAP 1300-1 ("Work Request") which were required for this work activity, specify the use of LAP 900-4. The licensee's use of the "personnel out-of-service" is not provided for in any of the procedures controlling the HCU work activity. This failure to accomplish activities affecting quality in accordance with documented instructions and procedures is in violation of 10 CFR 50, Appendix B, Criterion V (373/85027-02; 374/85028-02).

6. Reactor Trip System Reliability

Through review of surveillance procedures, test records and discussions with licensee personnel, the inspector determined that the licensee's surveillance program met the requirements of GL 83-28, Section 4.5.1.

For reactor trip surveillances, the licensee has proceduralized programs providing for their performance. The surveillances provide for on-line testing of the reactor trip circuits, while other administrative programs provide for the tracking, review, and approval of surveillance activities.

No violations or deviations were identified.

7. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. One open item disclosed during the inspection is discussed in Paragraph 4.

8. Exit Interview

The inspector met with licensee representatives listed in Paragraph 1 on August 22, 1985, and summarized the scope and findings of the inspection. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents or processes as proprietary.