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ComEd

April 4, 1997

**United States Nuclear Regulatory Commission**
**Attention: Document Control Desk**
**Washington, D.C. 20555**

Licensee Event Report #96-019-01, Docket #050-373 is being submitted to your office in accordance with 10 CFR 50.73(a)(2)(i).

LaSalle County Station performed a significant self-assessment of the Inservice Testing Program. The results of this assessment are provided in the attached supplement.

Respectfully,

Fred Dacimo
Plant General Manager
LaSalle County Station

Enclosure

IE22
1/1

cc: A. B. Beach, NRC Region III Administrator
M. P. Huber, NRC Senior Resident Inspector - LaSalle
C. H. Mathews, IDNS Resident Inspector - LaSalle
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INPO - Records Center

NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 05/31/95

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

# LICENSEE EVENT REPORT (LER)

| FACILITY NAME (1): | DOCKET NUMBER (2) | PAGE (3) |
|---|---|---|
| LaSalle County Station Unit One | 05000373 | 1 of 10 |

TITLE (4) Residual Heat Removal System Containment Spray Isolation Valves Not Tested According to ASME Section XI Requirements Due to Personnel Error

| EVENT DATE (5) | | | LER NUMBER (6) | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | |
|---|---|---|---|---|---|---|---|---|---|---|
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | MONTH | DAY | YEAR | FACILITY NAME | DOCKET NUMBER |
| 12 | 10 | 96 | 96 | 019 | 01 | 04 | 04 | 97 | FACILITY NAME | DOCKET NUMBER |

| | |
|---|---|
| OPERATING MODE (9) | 4 |
| POWER LEVEL (10) | 000 |

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

| | | | |
|---|---|---|---|
| ☐ 20.2201(b) | ☐ 20.2203(a)(3)(i) | ☐ 50.73(a)(2)(iii) | ☐ 73.71(b) |
| ☐ 20.2203(a)(1) | ☐ 20.2003(a)(3)(ii) | ☐ 50.73(a)(2)(iv) | ☐ 73.71(c) |
| ☐ 20.2203(a)(2)(i) | ☐ 20.2003(a)(4) | ☐ 50.73(a)(2)(v) | ☐ OTHER |
| ☐ 20.2203(a)(2)(ii) | ☐ 50.36(c)(1) | ☐ 50.73(a)(2)(vii) | |
| ☐ 20.2203(a)(2)(iii) | ☐ 50.36(c)(2) | ☐ 50.73(a)(2)(viii)(A) | (Specify in Abstract below and in Text, NRC Form 366A) |
| ☐ 20.2203(a)(2)(iv) | ☒ 50.73(a)(2)(i) | ☐ 50.73(a)(2)(viii)(B) | |
| ☐ 20.2003(a)(2)(v) | ☐ 50.73(a)(2)(ii) | ☐ 50.73(a)(2)(x) | |

LICENSEE CONTACT FOR THIS LER (12)

| NAME | TELEPHONE NUMBER (Include Area Code) |
|---|---|
| K. Kehring, Support Engineering | (815) 357-6761 Extension 2729 |

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS | | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | |
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SUPPLEMENTAL REPORT EXPECTED (14)

| | | | | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
|---|---|---|---|---|---|---|---|
| ☐ | YES (If yes, complete EXPECTED SUBMISSION DATE) | ☒ | NO | | | | |


ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines 16)

On December 9, 1996, an engineer, performing an assessment of the LaSalle Station Inservice Test program (IST), identified that the testing methods specified for the Unit 1 Residual Heat Removal (RHR) containment spray isolation valves were inconsistent. One train of motor-operated valves was being tested by timing the opening of the valves whereas another train was tested by timing the closing stroke. The Technical Specifications requires that these valves be full stroked to the position required to perform the valve's safety function, which in this case is from the full open position. This incorrect testing method had been performed on two valves until August 1996. The cause of this event is a human performance error. The valves were correctly tested in October, 1996, during cold shutdown per another IST procedure. The incorrect procedure has been revised. The station is in the process of performing a thorough assessment of the IST program. This event has minimal safety significance because, for this AC motor-operated valve, the valve stroke time is approximately the same for both the open and close directions.

Through the corrective actions of LER 374/96-006 and this LER, LaSalle Station completed a comprehensive self-assessment of the Second 10 Year Inservice Testing (IST) Plan on February 24, 1997. During this self assessment, 6 IST Code non-compliance issues were identified which included two required systems not in the plan, pump vibration criteria not in compliance to the current interval, valves not manually cycle tested, lift off force testing not performed for vacuum breakers, leak rate tests not extrapolated to functional pressure and valves not appropriately stroke time tested. This report is being submitted as a supplemental to LER 373/96-019, Report Date 01/09/97.

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

**A. CONDITION PRIOR TO EVENT**

Unit(s): 1/2 Event Date: 12/10/96 Event Time: 1700 Hours
Reactor Mode(s): 4/N Mode(s) Name: Cold Shutdown/ Defueled Power Level(s): 0%/0%

**B. DESCRIPTION OF EVENT**

On December 9, 1996 an engineer, performing an assessment of the LaSalle Station Inservice Test program (IST), identified that the testing methods specified for the Residual Heat Removal (RHR) containment spray isolation valves (RH/E12) [BO] were inconsistent. The quarterly surveillance procedure, LOS-RH-Q2, "RHR (LPCI) and RHR Service Water Valve Inservice Test for Operating, Startup and Hot Shutdown Conditions", required testing of the Unit 1 and Unit 2 motor-operated RHR containment spray isolation valves, 1(2)E12-F016A and 1(2)E12-F017A, by timing the valves to the open position. However, the valves on the other train of RHR, 1(2)E12-F016B and 1(2)E12-F017B, were tested by timing the closing stroke. Plant Technical Specification 4.0.5 requires that Inservice Testing of these valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except were specific written relief has been granted by the Commission. Inservice Testing of these valves is required to meet the requirements of the 1989 Edition of Section XI, with no Addenda, for the second 120-month interval, currently in progress. The 1989 Edition of Section XI requires that valves be tested in accordance with ASME/ANSI OM (Part 10). ASME/ANSI OM (Part 10) requires that these valves be exercised to the position required to fulfill their function(s) and that their stroke time be measured to at least the nearest second.

The IST program coordinator reviewed the test method differences with an Operations Department procedure writer on December 10, 1996. They determined that the testing requirements for the 1(2)E12-F016A and 1(2)E12-F017A valves were not correctly specified in LOS-RH-Q2, since they were timed by measuring the opening stroke rather than the closing stroke. This incorrect test method had been used during two previous quarterly surveillances performed on these valves on May 21, 1996, and August 13, 1996. Failure to test the valves in accordance with the ASME Section XI requirements is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B); any operation or condition prohibited by the plant's Technical Specifications.

During a review of the RHR System for the IST Program upgrade for the second 120-month interval, it was determined that the IST Program was in error, and that the safety-related function of these valves was to close rather than to open. Prior to the upgrade, it was apparently thought that 1(2)E12-F016A/B and 1(2)E12-F017A/B were required to open to fulfill their safety functions (i.e., to initiate containment spray), and the valves were tested accordingly. The surveillance procedures used to test these valves, LOS-RH-Q2 and LOS-RH-Q3, were revised in October, 1995, to reflect changes made to the IST Program.

Shortly after the second 120-month interval started and the revised procedures were in place, LOS-RH-Q2 Revision 22 was revised again to Revision 23 to incorporate changes resulting from an unrelated design change on Unit 1 in which vent and drain valves were installed at 1E12-F016A and 1E12-F017A to reduce the risk of hydraulic locking. The modification engineer had initiated a procedure change to LOS-RH-Q2 prior to October, 1995, and had used the earlier revision, Revision 21, which was in effect at that time.

When the procedure change request for Revision 23 was processed the engineer did not realize that Revision 22 was in effect and that the proposed change would negate the change to LOS-RH-Q2 in Revision 22 and reverse the test method for the 1(2)E12-F016A and 1(2)E12-F017A valves. The subsequent reviewers also did not identify this and Revision 23 was approved and distributed in February 1996.

Valves 1E12-F016A and 1E12-F017A were correctly tested in December, 1995, to Revision 22 of LOS-RH-Q2. They were then tested to the incorrect position in May, 1996, and August, 1996, using Revision 23. They were again tested correctly on October 6, 1996, during Cold Shutdown to a different test procedure, LOS-RH-Q3, "RHR (LPCI) and RHR Service Water Valve Inservice Test for Cold Shutdown or Refuel Conditions". In all cases, the valves were fully exercised to the open and closed position; only the measurement of stroke time was in the wrong direction. Only the Unit 1 Division 1 valves, 1E12-F016A and 1E12-F017A, were affected. The corresponding Unit 2 Division 1 valves, 2E12-F016A and 2E12-F017A, had been tested correctly during this period since the incorrect procedure change was not incorporated into the surveillance procedure until the current outage and had not been used. Also, the 1(2)E12-F016B and 1(2)E12-F017B valves were tested correctly.

On October 7, 1996, LaSalle Station, as a corrective action from a previous event involving improper component inservice testing, initiated a comprehensive self-assessment of the IST Program. The purpose of the self-assessment was to verify that program requirements are defined and implemented in accordance with regulatory requirements, Technical Specifications and ASME Codes. The IST Program assessment focused on verifying that the required systems and their components are being tested in accordance with the 1989 Edition of Section XI of the ASME Boiler and Pressure Vessel Code according to the function(s) they are required to perform, or if not, that specific written relief has been granted.

The UFSAR, Plant Technical Specifications and other supporting documentation describing system and component functions were used as the basis for this assessment.

The IST assessment consisted of reviewing the application of ASME Section XI requirements for each pump and valve in those systems determined to be required for safe shutdown or accident mitigation, as well as programmatic reviews of the IST Subprograms, including the Safety and Relief Valve Program, the Check Valve Disassembly and Inspection Program, and Instrument Calibration and Administrative Procedures. The following instances of non-compliance were identified:

The Reactor Core Isolation Cooling (RCIC) and Standby Liquid Control (SBLC) Systems were administratively removed from the IST Plan during the 1995 revision for the Second 10 Year Plan. The systems were removed during the plan revision because they were considered outside the scope of ASME Code requirements. These systems should have remained in the IST Program because they are required to mitigate the consequences of an accident.

Pump acceptance limits on vibration were not in compliance with the second ten-year interval requirements. Acceptance limits for 11 pumps were not correctly revised to conform to the updated criteria of the ASME Code (OM-6). Although the correct criteria of OM-6 were applied, errors were made in determining the specific pump vibration values.

The nine ECCS Strainer Backwash Valves may be required to be operated manually during certain events described in the UFSAR. As a result, these valves need to have a manual stroke as part of the IST Program. These valves were inservice tested using the motor operators, however they were not manually cycled as part of any past surveillance.

The Code requires that passive manual valves equipped with remote position indicating devices be tested to verify that the valve operation is accurately indicated. Most valves in question were cycled during performance testing of other system valves and for system maintenance, but the Position Indication Test (PIT) was not documented. 18 passive valves, which are required by OM-10 to receive a PIT, were not included in the IST Program and were not tested.

OM-10 provides testing requirements for check valves and also requires that relief valves, including vacuum breakers, be tested in accordance with OM-1. In the absence of clearly defined requirements for check valves used as vacuum breakers, current interpretation is that both the check valve testing requirements of OM-10 and the relief valve testing of OM-1 must be met unless relief has been granted. In order to satisfy the requirements of OM-10, the breakaway force applied to the mechanical exerciser when performing the check valve exercise test must be measured. This force measurement has not been performed. No testing has been performed to satisfy OM-1 relief valve testing requirements and no relief request was submitted. The primary containment vacuum breakers were mechanically exercised on a monthly basis and every refuel outage seat leakage tests are performed and lift tests using air are performed. The main steam safety relief valve downcommer vacuum breakers are mechanically exercised every refuel outage.

The feedwater containment isolation check valves are required to have both a Local Leak Rate Test (LLRT) and a high pressure seat leakage test. As a substitute for the high pressure seat leakage test, a calculation may be performed which extrapolates LLRT leakage to leakage at maximum functional differential pressure. The Feedwater Check Valves are currently only leak rate tested as Containment Isolation Valves in compliance with the requirements of 10 CFR 50, Appendix J for Type C testing. No calculation or high pressure leak test were performed.

Forty-six discrepancies in addition to the ones reported in the original LER, were found regarding valve stroke time measurement. Sixteen valves had stroke time measured in one direction only, when the valve in question had safety functions in both directions. Four valves had stroke time measured in one direction when the valve's safety function was in the opposite direction. Twenty-six valves which require stroke time measurement were not included in the IST Program. These additional discrepancies were different in nature than the ones reported in the original LER. The original LER and actions were against the testing as performed to the IST Plan. These additional discrepancies were not specified in the Plan.

**C. CAUSE OF EVENT**

The event occurred as a result of a human performance error while preparing LOS-RH-Q2 Revision 23. The engineer who prepared the procedure change started this work before Revision 22 had been issued and had copied steps from Revision 21, including that which timed the F016A and F017A valves open, into a new section for LOS-RH-Q2. When Revision 23 was initiated to incorporate the changes necessitated by the completed design change, the steps for testing the valves in Revision 22 were circled and labeled to substitute with the new section. This new section inadvertently changed the procedure back to record valve opening time. This error was the result of personnel error (inattention to detail). The changes made in Revision 22 of LOS-RH-Q2 were not recognized and adequately reviewed prior to initiating Revision 23.

Contributing causes were (1) a technical review of the procedure change (Revision 23) was completed but failed to identify that the proposed change to LOS-RH-Q2 would reverse the test method previously approved for the isolation valves, and (2) a programmatic deficiency in the procedure review process where the IST engineer was not included as a reviewer for procedure changes which affected components being tested to fulfill the ASME code requirements.

The cause of the instances of Code non-compliance in the IST Program is personnel error. The documents and procedures that govern the IST Program were incorrectly revised when the Second 10 Year Plan was developed. The updated plan was prepared by an engineer who misinterpreted some requirements and made incorrect assumptions or decisions on other requirements. Supervisory review of the updated plan did not detect these deficiencies.

**D. ASSESSMENT OF SAFETY CONSEQUENCES**

This event reports a failure to test two motor-operated containment spray isolation valves in the manner prescribed in the plant's IST program. The valves were tested at the required frequencies but, due to the procedural error described here, they were tested incorrectly over a period during which two quarterly surveillances were performed. The valves did remain available throughout the period, are closed in normal plant operation and would have closed at the designed condition to isolate primary containment if required. For this type valve, with an AC motor-operator, the measured valve stroke time is approximately the same whether stroked in the open or close direction. Testing methodology used both before and after Revision 23 of LOS-RH-Q2 was completed requires a full valve stroke to achieve the proper pre-test or post-test valve positions. This demonstrates that the valve had remained functionally available. And, prior to an IST program change in 1995, the valves had been tested in the open direction to verify operability. The open and close stroke times for these valves are comparable due to the gear ratios and the characteristics of the AC motors on the Limitorque valve actuators. With the existing gear ratios these valves move slowly, which results in minimal coasting following deenergization of the motors. With minimal coasting, the stroke time is proportional to the time the valve motor is energized, thus the closing stroke time is nearly identical to the opening stroke time. The AC Limitorque motor is designed to operate at a specific speed, regardless of valve load. During diagnostic valve testing performed on the affected valves during February 1996, it was demonstrated that the open and close stroke times are consistent. The safety significance of this event is minimal.

Review of the safety consequences of the additional items reported from the self assessment are as follows:

Although the Reactor Core Isolating Cooling and Standby Liquid Control Systems were administratively removed from the IST Program during the 1995 revision, surveillance testing was still performed and documented to the first ten year requirements. Review of surveillance data for these systems is satisfactory, with all components meeting current acceptance limits. There are no indications that these systems are not capable of performing their design function.

Although the pump acceptance criteria were not in complete compliance with the current second ten year interval requirements, a review of all pump inservice test data determined that no pumps were outside the acceptance criteria of OM-6 as required for the second ten year interval. There is no basis to suspect that any of the tested pumps are not capable of performing their design function.

The ECCS Strainer Backwash Valves have a manual action in certain situations. These valves need to be manually exercised as part of the IST Program. These valves have been manually operated satisfactorily during maintenance activities performed on these systems recently. All other required inservice testing was performed satisfactorily. There are no indications to suspect that any valves are not operable.

Valves with remote position indicators are required to be observed locally at least once every 2 years to verify that valve operation is accurately indicated. Most of the valves identified as deficient for a PIT are passive manual valves that are locked in position when the systems in which they are located are required to be operable by Technical Specifications. The other valves lacking a PIT are power-operated passive valves and are maintained in their safety-related position when the systems in which they are located are required to be operable, or are located in lines which are not in the flowpath required for the system to fulfill its safety function. Based on this evaluation, there is no basis to suspect that failure to perform the Position Indicating Test would adversely affect the ability of the subject systems to fulfill their required safety functions.

The vacuum breakers identified are the Main Steam Safety Relief Valve Downcommer Vacuum Breakers which are exercise tested using a mechanical exerciser on a refueling outage frequency, and the Drywell/Suppression Chamber Vacuum Breakers which are exercise tested using a mechanical exerciser on a monthly frequency. The drywell suppression vacuum breakers are also leak rate tested and lift tested using pressurized air. The lift test is performed on a refueling basis per technical specifications to less than or equal to .5 psid. The consistent passing of the lift test at a low pressure provides assurance that the vacuum breakers have not degraded. During this testing no indication of corrosion, binding, broken or loose parts, or other anomalies have been reported. Although the test method was not in strict Code compliance, there is no basis to suspect that the valves would be incapable of fulfilling the function for which they are designed.

The Feedwater Check Valves were leak rate tested satisfactorily as Containment Isolation Valves in accordance with the Type C test requirements of 10 CFR 50, Appendix J which is a low pressure air test. This low pressure air test is more conservative since it exhibits less seat force than the high pressure water test. Based on this testing, there is no reason to suspect that the Feedwater Check Valves would be unable to fulfill their safety function.

The deficiencies in stroke-time testing of power-operated valves fall into two categories: those which were tested to a position other than the valve's safety function and those which are not tested due to not being included in the IST Program. For those valves which are only tested to one position when the valve has a safety function in both directions or for those valves which are tested in the opposite direction than the valve's safety function, each valve is full stroked in both directions in order to test the valve and return it to its as found position. Since all of the subject valves are (AC) motor operated, the time in either direction would be approximately equal and thus be within the acceptance range limits specified in OM-10. The valves previously not stroke time tested are the fast-acting solenoid operated RHR sample isolation valves which have a safety function to close in the event of a loss of the non-safety related sample system in order to prevent leakage. These valves are operated intermittently for sampling the RHR System and are normally closed. Based on this evaluation, all of the valves described herein are capable of full-stroke operation.

There was no inoperable structure, system or component that resulted from this assessment.

Based on the above, the overall safety significance was determined to be minimal.

## E. CORRECTIVE ACTIONS

1. Procedure LOS-RH-Q2 has been revised to test the containment spray isolation valves in the close direction in accordance with the IST program.

2. The methods used in testing other motor-operated isolation valves were reviewed by the IST program coordinator and no other deviations from the IST program for valve stroke direction were identified.

3. The originator and technical reviewers involved in this procedure revision and review were counseled on the need for attention to detail in following the procedure revision procedure.

   This event is considered to be an isolated case. A self-assessment of the on-going operating procedure revision preparation and review efforts will be performed.

4. LaSalle Station personnel have been performing a thorough assessment of the IST program as a result of the event listed in the previous occurrence section of this report. This assessment is expected to be completed by March 1997.

5. The LaSalle Station Administrative Procedure LAP 820-2T, Station Procedure Preparation and Revision, will be revised to require that surveillance procedures for components tested to fulfill ASME code requirements are reviewed by the IST coordinator (cross-discipline review).

6. An action has been initiated to review the IST Program changes made in 1995 (when the program was upgraded to the second 120-month interval), to identify changes which were needed because the original program did not meet requirements. For any such changes, an assessment of safety consequences will be performed and a supplement to this LER or a new LER initiated, if required.

Corrective actions for the items identified in this supplement are listed for each issue.

7. The RCIC and SBLC Systems are being restored to the IST Program. This will be completed prior to unit start up. Inservice testing continues to be performed, reviewed and trended

8. Pump vibration acceptance limits have been updated to reflect compliance with the 1989 Code requirements. All future testing will use the updated criteria.

9. The ECCS Strainer Backwash Valves surveillance procedures are currently being revised to perform a manual exercising test. All future inservice testing of these valves will include the appropriate manual test.

10. Position Indication Test (PIT) requirements will be incorporated into the applicable surveillance procedures. All valves deficient in Position Indication Tests will be tested prior to unit restart.

11. Procedures will be revised to incorporate the measurement of breakaway force when mechanically cycling the Main Steam Safety Relief Valve Discharge Downcommer Vacuum Breakers and the Drywell/Suppression Chamber Vacuum Breakers. The valves will be tested prior to startup and the breakaway force will be measured. The measured breakaway force will be recorded as the reference value and acceptance criteria will be established. A request for relief from the vacuum breaker testing requirements of OM-1 is being prepared for submittal, based on the impracticality of testing to both sets of requirements and the fact that the check valve testing methods of OM-10 are more appropriate to the function of these valves. In the event that this relief request is not approved prior to unit restart, vacuum breaker testing as required by OM-1 will be performed.

12. Leak rate procedures for feedwater check valves will be changed to meet the requirements for a high pressure leak test or equivalent calculations will be performed. All future testing will use the updated criteria.

13. Procedures will be revised to ensure that all power-operated valves will be stroke-time tested to the position or positions necessary to fulfill the specific function or functions they must perform as required by OM-10. Applicable testing will be performed, reference values and acceptance criteria will be established prior to unit restart.

14. The station IST procedure will be revised to clearly define the responsibilities of the IST Coordinator and all other support personnel involved in the IST program. The administrative procedure will be issued as a station procedure rather than the current engineering departmental procedure.

15. An IST basis document will be prepared. The basis for application of Inservice Testing requirements to the components will be documented.

16. Experienced ASME Code personnel are assisting in the changes to the program and will provide continued mentoring of the IST Coordinator, who is a different IST Coordinator than the person holding that position during the preparation of the Second 10 Year IST Program. The experienced Code personnel will also serve as subject matter experts in developing and providing engineering training.

17. The second 10 Year IST Plan and relief requests will be revised and submitted by January 1998.

18. As part of the LaSalle Unit restart plan LaSalle Station is continuing critical self assessments in the areas of engineering processes, engineering programs, and plant system readiness. These assessments will be reviewing commitments against implementation. Similar weakness in other programs or processes with compliance to commitments will be identified, if present.

**F. PREVIOUS OCCURRENCES**

| LER NUMBER | TITLE |
|---|---|
| LER 374/96-006-00 | Unit 2A and 2B RHR Service Water Pumps not tested per ASME Section XI. |

This event reports a determination that the Unit 2 Division 1 Residual Heat Removal Service Water pumps were not being tested in accordance with licensing requirements of the Technical Specification 4.0.5 to follow ASME Section XI, Article IWP-1000, which requires compliance to ASME/ANSI OM (Part 6). These pumps were tested on a quarterly frequency, as required by ASME/ANSI OM Part 6, using LaSalle station surveillance procedure, LOS-RH-Q1. When the test could not be completed due to a valve deficiency, the procedure was revised and an incorrect test method was used which did not test each pump individually. As a corrective action, LaSalle Station initiated a thorough assessment of the IST program. In the course of that assessment, this recent program inconsistency for testing the RHR containment spray isolation valves was identified and is now being reported.

**G. COMPONENT FAILURE DATA**

Since no component failure occurred, this section is not applicable.