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ComEd

April 21, 1997

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

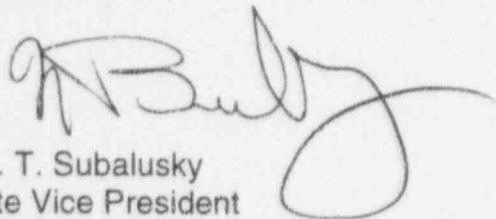
Subject: NOTICE OF VIOLATION; NRC INSPECTION
REPORT 50-373/374-97005

Reference: M. N. Leach letter to W. T. Subalusky, dated,
March 24, 1997, Transmitting NRC Inspection
Report 50-373/374-97005

The enclosed attachments contain LaSalle County Station's response to the
subject Notice of Violation, that was transmitted in the Reference letter.

If there are any questions or comments concerning this letter, please refer
them to me at (815) 357-6761, extension 3600.

Respectfully,

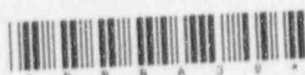


W. T. Subalusky
Site Vice President
LaSalle County Station

Enclosure

cc: A. B. Beach, NRC Region III Administrator
M. P. Huber, NRC Senior Resident Inspector - LaSalle
D. M. Skay, Project Manager - NRR - LaSalle

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**ATTACHMENT 1
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
373/374-97005**

VIOLATION (373/374-97005-01)

Technical Specification (TS) No. 6.2(B) required that radiation control procedures shall be maintained, made available to station personnel, and adhered to.

- a. Station radiation protection (RP) Procedure No. LRP 5721-6 (Revision 0), "Construction of Radiologically Posted Areas and Step-Off Pad Areas," required, in part, that prior to releasing a contaminated area for use, an RP technician shall ensure that reasonable efforts are made to prevent the spread of contamination from a contaminated area and that the area be properly posted and set-up.
- b. Station RP Procedure No. LRP 5721-6 (Revision 0), "Construction of Radiologically Posted Areas and Step-Off Pad Areas" required, in part, that hoses and electrical cords that breach a contaminated boundary be taped or tied securely, or otherwise secured, where they exit the area.
- c. Station RP Procedure No. LRP-5010-1 (Revision 3), "Radiological Posting and Labeling Requirements," required, in part, that radiation rope and/or tape be used to delineate all boundaries of a contaminated area.

Contrary to the above:

- a. As of February 23, 1997, an RP technician did not ensure reasonable efforts were made to prevent the spread of contamination from the contaminated areas in the Unit 1 "A" and "B" heater drain pump rooms prior to releasing them for use. Specifically, no controls were in place to prevent ground water from flowing from the posted contaminated areas to adjacent clean areas.
- b. As of February 23, 1997, in the 734' elevation of the radioactive waste building and in the Unit 1 "A" heater drain pump room, hoses and ropes breached a contaminated boundary without being taped or tied securely, or otherwise secured, where they exited the area.
- c. As of February 23, 1997, the boundaries of two sample sinks in the chemistry laboratory that were posted as potentially contaminated areas did not have the contaminated area boundaries delineated by radiation rope or tape.

This is considered a Severity Level IV violation (Supplement IV).

REASON FOR VIOLATION:

Station management has previously tolerated a low standard for plant radiological housekeeping. Management has previously not held workers and first line supervisors accountable for radiological procedural adherence.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:

The contaminated area boundaries in the Unit 1 A and B heater drain pump rooms were adjusted to completely enclose the plant floor drains on February 25, 1997, and March 3, 1997, respectively. The Unit 1 A and B heater drain pump rooms were subsequently decontaminated and released on April 11, 1997, for general entry. The contaminated area boundary on the 734' elevation of the radwaste building was adjusted on February 24, 1997, to enclose the chain fall that crossed the contaminated area boundary. The two sample sinks in the chemistry laboratory were marked with rad tape on the same day the concern was identified.

CORRECTIVE ACTIONS TO BE TAKEN TO PREVENT FURTHER VIOLATIONS:

The violation examples cited above are additional examples of previous poor practices. At the time of this inspection, the corrective actions from a previous violation had not yet been fully implemented (response to violation 373/9601309; letter dated February 27, 1997, from W. T. Subalusky to USNRC). A copy of the response to 373/9601309 is included as Attachment 2. The corrective actions are being implemented. A summary of two of the corrective actions and preliminary results include:

- Senior management has communicated their expectations for adherence to good radiation protection (RP) practices. Strong corrective measures will be taken when any individual violates RP procedures or good practices.
- Since implementing these actions, ten events involving nine individuals have been reviewed by RP. Seven of the events involved rad key control, two rad worker practices and one documentation associated with a personnel contamination event. In each case, radiologically posted area access was restricted pending RP review and action.
- RP has assigned ownership of various areas of the plant to RP personnel who conduct routine tours and inspections of these areas.
- Results from the tours performed beginning in early March through April 1997, identified no further examples of unsecured items crossing contaminated area boundaries.
- A review of the PIF's generated since February 28, 1997, also did not identify and occurrences of items crossing contaminated area boundaries.

In addition to the above, the station has reduced the contaminated area from 18.5% on February 28, 1997, to 13.1% as of April 14, 1997. These efforts to significantly reduce the square footage of contaminated area and the number of contaminated rooms will help reduce the challenges to radiation workers by reducing the need to cross contaminated area boundaries with ropes, hoses, and chainfalls.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on March 3, 1997, when the Unit 1 B heater drain pump room contaminated area boundary was expanded to enclose the floor drain.

ATTACHMENT 2
COPY OF RESPONSE TO NOTICE OF VIOLATION 373/374-96013-09
(REFERENCE W. T. SUBALUSKY LETTER TO U.S. NRC DATED FEBRUARY 27, 1997)

VIOLATION: 373/374-96013-09

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:

- 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).

REASON FOR VIOLATION: 373/374-96013-09

Station management has tolerated a low standard for plant radiological housekeeping. Management has not held workers and first line supervisors accountable for radiological procedural adherence.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:

The hoses were secured on October 11, 1996. Additional walkdowns of all areas of the plant were walked down on February 21, 1997, and all hoses, cords, etc. were verified to be properly secured where they cross contamination boundaries.

Senior management has communicated their expectations to site personnel for adherence to procedures including adherence to good radiation protection (RP) practices. Strong corrective measures will be taken when any individual violates RP procedures or good practices. This includes such measures as having the involved individual and their supervisor's access to the RPA removed pending direct counseling by RP Supervision. Escalated corrective action up to and including termination will be taken with individuals involved in repeat occurrences.

Expectations for Zone Technicians were again communicated on February 24, 1997, with the emphasis on finding and correcting radiological deficiencies and documenting these occurrences via the PIF process.

CORRECTIVE ACTIONS TO BE TAKEN TO PREVENT FURTHER VIOLATIONS:

New expectations have been set and incorporated into LAP-2200-2, "Radiation Protection Memorandum", on February 28, 1997, for Radiation Protection Technicians and Radiation Protection Management on ensuring workers are following radiological procedures. If a technician and/or Radiation Protection management person is in the field and fails to correct a poor radworker practice, they will have their RPA access denied and will need to meet with the Radiation Protection Manager or designee for coaching and RPA access reinstatement. Repeated failure to correct deficiencies will result in individual escalated corrective action up to and including termination of employment.

Radiation Protection (RP) has assigned ownership of various areas of the plant to RP personnel. Expectations have been established for routine tours and inspections of these areas. The frequency of tours and continuing need for inspections will be reviewed every six months.

Visual aids showing the proper clothing for minimum and a full set of protective clothing have been posted in conspicuous locations around the plant including near the bins where radiation workers pick up protective clothing.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on October 11, 1996, when the hoses were properly secured as required by LRP-1490-1.