

Commonwealth Edison Company
LaSalle Generating Station
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February 25, 1997

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

Licensee Event Report #96-015-01, Docket #050-373 is being submitted to your office in accordance with 10 CFR 50.73(a)(2)(i).

Respectfully,

A handwritten signature in dark ink, appearing to read "Dacimo", with a stylized flourish at the end.

Fred Dacimo
Plant General Manager
LaSalle County Station

Enclosure

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

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LICENSEE EVENT REPORT (LER)

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.

FACILITY NAME (1):

LaSalle County Station Unit One

DOCKET NUMBER (2)

05000373

PAGE (3)

1 of 5

TITLE (4)

Misinterpretation of Technical Specification Surveillance Results in Inoperable Diesel Driven Fire Suppression Pumps

EVENT DATE (5)			LEX NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
11	26	96	96	015	01	02	25	97	LaSalle County Station Unit Two	05000374
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)										
4										
000										
			<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71(b)				
			<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2003(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(c)				
			<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2003(a)(4)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> OTHER				
			<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(vii)					
			<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)					
			<input type="checkbox"/> 20.2203(a)(2)(iv)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	(Specify in Abstract below and in Text, NRC Form 366A)				
			<input type="checkbox"/> 20.2003(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)					

LICENSEE CONTACT FOR THIS LER (12)

NAME

Rodney Vickers, Fire Protection Engineer

TELEPHONE NUMBER (Include Area Code)

(815) 357-6761 Extension 2445

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)		
YES	NO	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO			

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

Both diesel driven fire suppression pumps were declared inoperable at 1645 hours on November 26, 1996, when Engineering identified that maintenance on the diesel fire suppression pumps had not always been performed "during shutdown," as required by Technical Specification 4.7.5.1.2.c. Maintenance has been performed on the diesels in accordance with manufacturer's recommendations at the manufacturers recommended frequencies; however, maintenance has not always been performed during shutdown. In addition, the manufacturer's recommended frequencies do not correspond with the Technical Specification frequencies. The cause of the event is a misinterpretation of Technical Specification Surveillance Requirement 4.7.5.1.2.c. The frequency for performing the maintenance will be changed to correspond with the Technical Specification frequency and the inspections will be performed during shutdown. The safety significance of this event is minimal because the maintenance of the diesel fire suppression pumps was being conducted in accordance with manufacturer's recommendations.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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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: 11/26/96	Event Time: 1645 Hours
Reactor Mode(s): 4/N	Mode(s) Name: Cold	Power Level(s): 0%/0%
	Shutdown/Defueled	

B. DESCRIPTION OF EVENT

At 1645 hours on November 26, 1996, both diesel driven fire suppression pumps [KP] were declared inoperable when Engineering identified that maintenance had not always been performed on the diesels during shutdown as required by Technical Specification 4.7.5.1.2.c. This condition was discovered while revising procedures to reflect changes in manufacturer's recommended maintenance practices.

Technical Specification 4.7.5.1.2.c. requires that each diesel driven fire suppression pump shall be demonstrated operable "at least once per 18 months, during shutdown, by subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service".

Maintenance is currently performed on the diesel driven fire suppression pumps in accordance with LaSalle Maintenance Surveillances LMS-FP-12A, "Diesel Fire Pump Engine Six Month Surveillance"; LMS-FP-12B, "Diesel Fire Pump Engine Annual Surveillance"; LMS-FP-12C, "Diesel Fire Pump Engine Major Maintenance Surveillance"; LMS-FP-12D, "Diesel Fire Pump Engine Spring Surveillance; and LMS-FP-12E, "Diesel Fire Pump Engine Fall Surveillance. These procedures were developed in conjunction with manufacturers recommendations and operating experience and are performed at intervals (i.e., 6 months, 12 months, and 24 months) recommended by the manufacturer. These recommended frequencies do not correspond with the Technical Specification frequencies.

This event is reportable per 10 CFR 50.73(a)(2)(i)(B) due to not performing the surveillance in accordance with Technical Specifications.

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C. CAUSE OF EVENT

The cause of the event is a misinterpretation of Technical Specification Surveillance Requirement 4.7.5.1.2.c. The diesel fire pumps are required to be operable "at all times" (e.g., pump operability is not dependent upon plant operating condition). Shutdown was interpreted as meaning the shutdown of the pump rather than the shutdown of the unit. As a result, the associated maintenance surveillance did not indicate that the surveillance needed to be performed during shutdown as required by Technical Specification Surveillance Requirement 4.7.5.1.2.c.

D. ASSESSMENT OF SAFETY CONSEQUENCES

The safety consequences of this event are minimal. Maintenance is performed on the diesels in accordance with LaSalle Maintenance Surveillances LMS-FP-12A, LMS-FP-12B, LMS-FP-12C, LMS-FP-12D, and LMS-FP-12E. These procedures were developed in conjunction with manufacturer's recommendations and operating experience. These Surveillances are performed at intervals (i.e., 6 months, 12 months, and 24 months) recommended by the manufacturer. Although the manufacturer's recommended frequencies do not correspond with the Technical Specification frequency, maintenance has been performed in accordance with manufacturer's recommendations at the manufacturers recommended frequencies. Maintenance was current on both diesels and both were available for use when they were declared inoperable on November 26, 1996.

E. CORRECTIVE ACTIONS

Action Statement b.1 of Technical Specification 3.7.5.1 requires that a backup fire suppression water system be established within 24 hours with the fire suppression water system inoperable. The station's Service Water System was established as the backup fire suppression water system in accordance with LaSalle Operating Abnormal Procedures LOA-FP-101, "Unit 1 Fire Protection System Abnormal" and LOA-FP-201, "Unit 2 Fire Protection System Abnormal". Both diesel driven fire suppression pumps were fully available when they were declared inoperable.

Completion of LaSalle Maintenance Surveillance LMS-FP-12C will satisfy Technical Specification surveillance requirement 4.7.5.1.2.c. Maintenance inspections were performed on the OA Diesel Fire Pump (in accordance with LaSalle Maintenance Surveillances LMS-FP-12C and LMS-FP-12E), during shutdown, the week of December 2, 1996. During the course of performing the inspections on the OA Diesel Fire Pump Engine, problems were identified with the Diesel Fire Pump fuel oil day tank level instrumentation. Repair of this unrelated problem has been completed, and the OA Diesel Fire Pump was declared operable on January 6, 1997.

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Maintenance inspections were performed on the 0B Diesel Fire Pump (in accordance with LaSalle Maintenance Surveillances LMS-FP-12C and LMS-FP-12E), during shutdown, the week of December 9, 1996. The 0B Diesel Fire Pump was declared operable on December 21, 1996. These maintenance inspections were performed in accordance with procedures prepared in conjunction with its manufacturer's recommendations.

1. The frequency for the 24-month maintenance will be changed to once per 18 months during shutdown in the general surveillance tracking program. Changes to appropriate procedures will be made prior to their next use.
2. In July, 1996, LaSalle County Station submitted a request to relocate the fire protection requirements in the Technical Specifications to the Updated Final Safety Analysis Report and the Administrative Technical Requirements. That submittal also requested the replacement of the existing Fire Protection license conditions with the standard license condition for a fire protection program as suggested in Generic Letter 86-10. Upon NRC approval of our request, appropriate changes will be made to the subject surveillance requirement in accordance with 10 CFR 50.59 and the On-Site Review process.

A search of the LaSalle Technical Specifications was performed to identify all other instances where surveillances are required to be performed "during shutdown". The results of this review revealed that all surveillances required to be performed during shutdown are being performed during the appropriate plant mode (i.e., during shutdown).

In addition, two other programs are being implemented which provide added confidence that the Technical Specifications are consistent with other plant documentation and/or are being appropriately implemented.

1. System Functional Review Program

The program was initiated to establish a level of confidence that selected systems demonstrate performance consistent with the design basis. One of the elements of the program is to identify required system functions and sub-functions as described in design bases documents including the Technical Specifications. Surveillance testing requirements and procedures and other test documentation are then reviewed to confirm that system functionality is demonstrated. Any inconsistencies identified among the source documents are being documented and tracked to resolution. This program is being implemented with applicable corrective actions completed prior to restart.

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2. UFSAR Validation

To ensure the integrity of the UFSAR, a verification and validation of the regulatory design basis information contained in the UFSAR is being performed. This includes a review of the UFSAR, the Technical Specifications, and other applicable documents and plant procedures. This activity was described in a ComEd letter to the NRC (Mr. A. Bill Beach) dated January 30, 1997.

F. PREVIOUS OCCURRENCES

LER NO.: TITLE:

- 373-96-012 Auxiliary Electric Equipment Found to not Meet GDC 19 Habitability Requirements Due to Failure to Understand the Design and Licensing Basis.
- 374-96-005 Failure to Follow Procedures Results in Technical Specification Violation of the Core Standby Cooling System Pond Surveillance.
- 373-96-013 Emergency Diesel Generator Fuel Oil Not Analyzed in Accordance with Technical Specification Requirements Due to Procedural Deficiency.

G. COMPONENT FAILURE DATA

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