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ComEd

May 26, 2000

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

LaSalle County Station, Unit 1
Facility Operating License No. NPF-11
NRC Docket No. 50-373

Subject: Licensee Event Report

In accordance with 10 CFR 50.73(a)(2)(iv), Commonwealth Edison (ComEd) Company is submitting Licensee Event Report #00-002-00, Docket No. 050-373.

Attachment A provides the commitment(s) for this submittal.

Should you have any questions concerning this letter, please contact Mr. Frank A. Spangenberg, III, Regulatory Assurance Manager, at (815) 357-6761, extension 2383.

Respectfully,

Charles G. Pardee
Site Vice President
LaSalle County Station

Attachments: Regulatory Commitment(s) - Attachment A
Licensee Event Report

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - LaSalle County Station

RGN-001

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Attachment A
Regulatory Commitment(s)

ComEd is committing to the following actions. Any other actions discussed in this submittal represent intended or planned actions by ComEd. They are described to the NRC for the NRC's information and are not regulatory commitments.

Regulatory Commitment(s)	*Tracking Number*
LOP-RT-02 has been revised to assure that system pressure is approximately equal to reactor pressure using LOP-RT-01, prior to opening the inlet isolation valves.	Complete
LOP-RT-01 will be revised to include system pressurization in the title.	ATM# 28269-23
Licensed operating personnel will be trained in the operating philosophies of the RT system.	ATM# 28269-17
Training will be conducted for System Engineers that will emphasize the need to communicate important equipment status and performance issues with Operations.	ATM# 28269-19
The reportability determination process will be reviewed with Senior Reactor Operators and Regulatory personnel to assure that similar reportability errors do not recur.	ATM# 28269-26

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-
EXPIRES 06/30/2001

LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), 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. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1):	DOCKET NUMBER (2)	PAGE (3)
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TITLE (4) Inadvertent Reactor Water Cleanup System Isolation During System Startup Due to Personnel Errors

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
04	26	00	00	002	00	05	26	00	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	1
POWER LEVEL (10)	100

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

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

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Charles Maney, Operations Staff	(815) 357-6761 Extension 2929

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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 April 26, 2000, Unit 1 was in Operational Mode 1 at 100 percent power. The Reactor Water Cleanup System (RT)[CE] was being placed in service in accordance with procedure LOP-RT-02, "Reactor Water Cleanup System (RWCU) - Startup and Pump Transfer." At 1318 hours, the inlet isolation valve (1G33-F004) was opened, and an Engineered Safety Feature (ESF) isolation of the RT system occurred on high suction flow. The RT system was walked down to verify that there was no system leakage, and the RT system was subsequently placed in service.

The causes of this event were personnel error and defective procedures. Licensed control room operators failed to follow the procedural requirements of procedure LOP-RT-02 verbatim, and the procedure was also deemed to be inadequate. Corrective actions include training and procedure enhancements.

The safety significance of the event was minimal. The RT isolation valves operated as designed, there was no leakage from the system, and operation of the reactor was not directly or immediately affected by isolation of the system during a return to service.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
LaSalle County Station, Unit 1	05000373	00	002	00	2 of 4

(If more space is required, use additional copies of NRC Form 366A)(17)

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor, 3323 Megawatts Thermal Rated Core Power

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

A. CONDITION PRIOR TO EVENT

Unit(s): 1 Event Date: 04/26/00 Event Time: 1318 Hours
Reactor Mode(s): 1 Power Level(s): 100
Mode(s) Name: Run

B. DESCRIPTION OF EVENT

On April 26, 2000, the Unit 1 Reactor Water Cleanup System (RT)[CE] was being placed in service following preventative maintenance, in accordance with procedure LOP-RT-02, "Reactor Water Cleanup System (RWCU) - Startup and Pump Transfer." Prerequisite B.3 for this procedure requires that "The RWCU system has been filled and vented per LOP-RT-01, Reactor Water Cleanup System (RWCU) Filling and Venting, unless directed to this procedure by LOA-RT-101/201." The control room operators had reviewed this prerequisite and determined that the scope of work had not drained the system, and that the prerequisite was therefore met.

At 1318 hours, the inlet isolation valve (1G33-F004) was opened, and an Engineered Safety Feature (ESF) isolation of the RT system immediately occurred on high suction flow. The RT system was walked down to verify that there was no system leakage, and the RT system was subsequently placed in service.

A review of the RT system status determined that there were a number of drainage paths the control room operators had not considered, including process sample lines and leaking manual vent valves. The RT system was, in fact, depressurized and partially drained when the inlet isolation valve was opened, resulting in an inrush of water into the system and a high suction flow isolation.

The event was reviewed for reportability under 10 CFR 50.72, and it was initially believed that the ESF signal was invalid and therefore not reportable. After further evaluation, the signal was determined to have been valid and reportable under 10 CFR 50.72(b)(2)(ii) and 50.73(a)(2)(iv) as an event that resulted in the automatic actuation of an Engineered Safety Feature. Notification was made via the Emergency Notification System at 1802 CDT on May 4, 2000.

C. CAUSE OF EVENT

The root causes of the event were personnel error on the part of the operating crew and defective procedures. The licensed control room operators failed to adequately perform prerequisite B.3 in LOP-RT-02, which required that the system be filled and vented in accordance with LOP-RT-01, "Reactor Water Cleanup System (RWCU) Filling and Venting." Their conclusion that this prerequisite had been met was based, in part, on an evaluation of the scope of work that had been performed while the system was out-of-service. The RT system had been isolated to perform breaker inspections, which presented no potential to drain the system. The operators were unaware that the RT system was operating with known leaks on manual vent valves 1G33-FO24C and 25C that resulted in the system being depressurized and partially drained. This materiel condition issue was not communicated to the operators.

In addition, procedures LOP-RT-02 and LOP-RT-01 were defective. LOP-RT-01 had been revised after an isolation event in 1998 to include instructions for pressurizing the system, but the title of the procedure had not been changed to reflect the expanded scope. The prerequisite in LOP-RT-02 required performance of the fill and vent procedure, but did not clearly state that the RT system needed to be pressurized in accordance with LOP-RT-01 when starting up at rated conditions. Believing that the system was filled and vented, and not recognizing that the prerequisite was intended to include pressurizing the RT system, the operators did not perform LOP-RT-01 prior to the attempt to startup the RT system. Had LOP-RT-01 been performed to fill, vent, and pressurize the RT system, the isolation would not have occurred.

D. SAFETY ANALYSIS

The safety significance of the event was minimal. The RT system had been out of service, and was being returned to service. The RT isolation valves operated as designed, and there was no leakage from the system. The RT system removes solid and dissolved impurities from the reactor coolant, and operation of the reactor was not directly or immediately affected by an isolation of the system during a return to service.

E. CORRECTIVE ACTIONS

Immediate Actions:

1. The RT system was walked down by Operations and System Engineering and evaluated for leakage and damage prior to starting up the system (Complete).

2. As an interim measure, operating shift crews were notified via a Daily Order that RT system pressures must be equalized prior to opening the isolation valves (Complete).

Corrective Actions to Prevent Recurrence

3. LOP-RT-02 has been revised to assure that system pressure is approximately equal to reactor pressure using LOP-RT-01, prior to opening the inlet isolation valves (Complete).

4. LOP-RT-01 will be revised to include system pressurization in the title (ATM# 28269-23).

5. Licensed operating personnel will be trained in the operating philosophies of the RT system (ATM# 28269-17).

6. Training will be conducted for System Engineers that will emphasize the need to communicate important equipment status and performance issues with Operations (ATM# 28269-19).

7. The reportability determination process will be reviewed with Senior Reactor Operators and Regulatory personnel to assure that similar reportability errors do not recur (ATM# 28269-26).

F. PREVIOUS OCCURRENCES

LER NUMBER	TITLE
373/98-013	Reactor Water Cleanup Isolations Due to Inadequate Operating Procedure Guidance

Corrective actions from this event were not effective in making all operators aware of the need to perform the fill and vent procedure LOP-RT-01 when a large differential pressure is present.

G. COMPONENT FAILURE DATA

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