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August 16, 2000

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

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Licensee Event Report

In accordance with 10 CFR 50.73(a)(2)(i), Commonwealth Edison (ComEd) Company is submitting Licensee Event Report Number 00-004-00, Docket No. 050-373.

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,

A handwritten signature in black ink, appearing to read "C. Pardee", with a long horizontal flourish extending to the right.

Charles G. Pardee
Site Vice President
LaSalle County Station

Attachment

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

IE22

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): LaSalle County Station, Unit 1	DOCKET NUMBER (2) 05000373	PAGE (3) 1 of 3
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TITLE (4) Inadequate Channel Functional Testing of Reactor Protection System due to Procedure Deficiency

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
07	17	00	00	004	00	08	16	00	LaSalle County Station, Unit 2	05000374
									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)								
		<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)		<input checked="" type="checkbox"/> 50.73(a)(2)(i)		<input type="checkbox"/> 50.73(a)(2)(viii)			
		<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2003(a)(3)(i)		<input type="checkbox"/> 50.73(a)(2)(ii)		<input type="checkbox"/> 50.73(a)(2)(x)			
		<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2003(a)(3)(ii)		<input type="checkbox"/> 50.73(a)(2)(iii)		<input type="checkbox"/> 73.71			
		<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2003(a)(4)		<input type="checkbox"/> 50.73(a)(2)(iv)		<input type="checkbox"/> OTHER			
		<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(1)		<input type="checkbox"/> 50.73(a)(2)(v)		Specify n Abstract below or in NRC Form 366A			
		<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(c)(2)		<input type="checkbox"/> 50.73(a)(2)(vii)					

LICENSEE CONTACT FOR THIS LER (12)

NAME Mark Venaas, Operations Staff	TELEPHONE NUMBER (Include Area Code) (815) 357-6761 Extension 2771
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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)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines 16)

On July 17, 2000, it was determined that procedure LOS-RP-Q3, "Main Steam Isolation Valve (MSIV) Scram Functional Test," did not include all the steps necessary to perform a complete channel functional test (CFT) as required by Technical Specification (TS) 3.3.1, "Reactor Protection System Instrumentation." The procedure only verified that at least one of the two limit switches on each MSIV would provide a position signal to the reactor protection logic.

At 1625 hours on July 17, 2000, a 24-hour shutdown time clock was entered per TS 4.0.3, on both Units 1 and 2. LOS-RP-Q3 was revised to correct the deficiency, and the CFT was acceptably performed on both Units. The time clocks were exited at 0150 hours on July 18, 2000 for Unit 2, and 0515 hours on July 18, 2000 for Unit 1.

The cause of the event was a pre-existing procedure deficiency that was due to insufficient rigor in the procedure preparation and review process. Corrective actions included revising the affected procedure, and communicating the event to all technical procedure writers.

The safety significance of the event was minimal. Successful performance of the corrected procedure demonstrated that the MSIV limit switches would have performed their intended safety function.

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PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor, 3489 Megawatts Thermal Rated Core Power

A. CONDITION PRIOR TO EVENT

Unit(s): 1/2 Event Date: 07/17/00 Event Time: 1625 Hours
 Reactor Mode(s): 1/1 Power Level(s): 100/100
 Mode(s) Name: Run/Run

B. DESCRIPTION OF EVENT

On July 16, 2000, during performance of channel functional test (CFT) procedure LOS-RP-Q3, "Main Steam Isolation Valve Scram Functional Test," one of the two valve position limit switches for the 2B Main Steam Isolation Valve (MSIV) did not reset after the MSIV was opened, and the "2A/2B MSIV INBD/OTBD NOT FULL OPEN" alarm did not clear. An action request was written to troubleshoot and repair the limit switch.

On July 17, 2000, the alarm logic for the "2A/2B MSIV INBD/OTBD NOT FULL OPEN" was reviewed. The alarm had not cleared because the associated logic relay had not re-energized because the limit switch had not reset. It was then recognized that since the "2A/2B MSIV INBD/OTBD NOT FULL OPEN" alarm was still in, only one of the two limit switches was required to actuate the alarm. The surveillance procedure LOS-RP-Q3 used receipt of the alarm to verify that the MSIV limit switches send a closed signal to the Reactor Protection System (RP)[JE] logic when the MSIV is less than 92 percent open. Since either of the two limit switches in the closed position would actuate the alarm, it was determined that LOS-RP-Q3 did not fully test each limit switch, and was inadequate to fulfill the CFT surveillance requirements of Technical Specification (TS) 3/4.3.1, "Reactor Protection System Instrumentation."

At 1625 hours on July 17, 2000, a 24-hour shutdown time clock was entered per TS 4.0.3, on Units 1 and 2. Procedure LOS-RP-Q3 was revised to provide instructions for verifying that both limit switches send closed signals to the RP system logic. A CFT was performed in accordance with the revised procedure on both Units. The time clocks were exited at 0150 hours on July 18, 2000 for Unit 2, and 0515 hours on July 18, 2000 for Unit 1.

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

C. CAUSE OF EVENT

The cause of the event was a long term procedure deficiency, which was due to insufficient rigor in the procedure preparation and review process. The event investigation found that the procedure deficiency had existed since plant startup in 1982. During a period in 1997 and 1998, the testing methodology was changed to address a concern identified during the System Functional Performance Review (SFPR) of the Reactor Protection System, which was reported in LER 97-023-00 Docket 373. This change in methodology coincidentally provided verification that both limit switches would actuate when the MSIV was closed, thereby satisfying the CFT requirements. However, in 1998, as part of the Station's half-scrum

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reduction effort, LOS-RP-Q3 was again changed, and the still unidentified deficiency in the procedure was restored.

D. SAFETY ANALYSIS

The safety significance of the event was minimal. Successful performance of the corrected LOS-RP-Q3 demonstrated that the MSIV limit switches would have performed their intended safety function.

E. CORRECTIVE ACTIONS

1. LOS-RP-Q3 was revised to correct the deficiency. The procedure was performed acceptably on both Units (Complete).
2. An extent of condition review was performed to identify any similar logic testing errors, with an emphasis on changes made to support half scram reduction efforts. No other errors were found (Complete).
3. The details of this event will be communicated to all technical procedure writers as a lessons-learned (ATM 32083-16).

F. PREVIOUS OCCURRENCES

LER NUMBER	TITLE
LER 373/97-023	Inadequate Channel Functional Testing of Reactor Protection System due to Procedure Deficiencies

The specific discrepancy identified in LER 97-023 was unrelated to the one in this LER. Corrective actions to review surveillance procedures to ensure that all portions of the logic circuitry were adequately tested did not identify this issue.

G. COMPONENT FAILURE DATA

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