

Exelon Generation Company, LLC LaSalle County Station 2601 North 21*Road Marseilles, IL 61341-9757 www exeloncorp com

Nuclear

January 21, 2003

10 CFR 50.73

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)(v)(D) and (a)(2)(ii)(B), Exelon Generation Company, (EGC), LLC, is submitting Licensee Event Report Number 02-001-00, Docket No. 050-373.

Should you have any questions concerning this letter, please contact Mr. Glen Kaegi, Regulatory Assurance Manager, at (815) 415-2800.

Respectfully,

Susan R. Landah

Plant Manager

LaSalle County Station

Attachments:

Licensee Event Report

cc: Regional Administrator - NRC Region III

NRC Senior Resident Inspector - LaSalle County Station

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NRC-FORM 366 (7-2001)			U.S. NUCLEAR REGULATORY COMMISSION					Estim	APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004 Estimated burden per response to comply with this mandatory					
1 2 3							information collection request. 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send							
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								a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information						
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16. ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines)

On November 21, 2002, during inspection of the Unit 2 High Pressure Core Spray (HP) 2VY02A area cooler, several one-quarter inch sheet metal screws used to mount the cooling coils to the frame inside the cooler were observed to be missing. November 22, 2002, it was determined that the missing screws could have prevented the HP system, a single train safety system, from performing its design function during a seismic event. An extent of condition review found screws also missing from the Unit 1 Division 2 area cooler 1VY03A and the Unit 2 Division 2 area cooler 2VY03A.

The systems were removed from service, the coolers were repaired, and the systems were returned to operable status as the conditions were identified. The significance of this condition was that, with the area coolers inoperable, the associated ECCS pumps might not have performed their safety function during a seismic event. On Unit 2, both Divisions 2 and 3 were affected.

The cause of the missing screws could not be identified; however, a contributing cause was that the condition may have gone unobserved or unreported for several years. Corrective actions, including training, will be taken to assure that such conditions are identified and corrected.

NRC FORM 366 (7-2001)

NRC_FORM 366A (7-2001)

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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•		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
LaSalle County Station, Unit 1	05000373	02	- 001 -	00	2 of 3

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

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: 11/21/02

Event Time: 0930 Hours

Reactor Mode(s): 1/1

Power Level(s): 100/97

Mode(s) Name: Run/Run

B. DESCRIPTION OF EVENT

On November 21, 2002, during inspection of the Unit 2 High Pressure Core Spray (HP) [BG] 2VY02A area cooler, several one-quarter inch sheet metal screws used to mount the cooling coils to the frame inside the cooler were observed to be missing. On November 22, 2002, it was determined that the missing screws could have prevented the HP system, a single train safety system, from performing its design function during a seismic event, and constituted a safety system failure.

The HP system was declared inoperable, and the required actions of Technical Specification (TS) 3.5.1 were entered. An ENS phone call was made at 1650 hours on November 22, 2002, in accordance with 10 CFR 72(a)(2)(v)(D). The missing screws were replaced and the HP system was declared operable at 0215 hours on November 23, 2002.

An extent of condition inspection was performed on the remaining divisional area coolers on both Units. During this inspection, it was discovered that the Unit 1 Division 2 area cooler (1VY03A) was also missing several screws. The associated systems were declared inoperable, the cooler was repaired, and the systems returned to operable status. No discrepancies were discovered on either of the two remaining Unit 1 divisional area coolers.

On Unit 2, the Division 2 area cooler (2VY03A) was found to be missing all of its screws. The associated systems were declared inoperable, the cooler was repaired, and the systems returned to operable status at 0958 hours on November 23, 2002.

At the time of discovery of the Unit 2 Division 2 inoperability, the Unit 2 HP (Division 3) area cooler had already been repaired and declared operable. However, it was determined that at some point the Division 2 and Division 3 emergency core cooling system (ECCS) injection subsystems had been inoperable at the same time. Per TS 3.5.1 bases, when this combination of ECCS subsystems is inoperable, the plant is in a condition outside of the design basis. An ENS phone call was made at 1233 hours on November 23, 2002, as required by 10 CFR 72 (a) (2) (ii) (B).

The extent of condition review also found two Control Room and Aux Electric Equipment Room HVAC (VC/VE) coolers that had some missing screws; however, it was determined that there were enough screws installed to make the coolers operable. The screws were replaced.

C. CAUSE OF EVENT

The root cause of the event could not be determined. Investigation was unable to determine why or when the screws were removed, or if they had ever been installed. A contributing cause was that the condition may have gone unobserved

NRC FORM 366A (7-2001)

NRC FORM 366A (7-2004)

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

or unreported for several years, even though there were opportunities for Maintenance and Engineering personnel to identify it during work or testing activities inside the cooler. Because these screws are internal to the cooler enclosure, operations personnel did not have an opportunity to identify this issue during plant walkdowns and routine tours.

D. SAFETY ANALYSIS

There were no safety consequences from this event, because no seismic events occurred during the time the screws were not installed.

While the likelihood of a seismic event of sufficient magnitude to approach the design basis earthquake (DBE) load is low, the consequences of a DBE had the coolers been degraded could be significant. The affected coolers would not function, which would eventually lead to the loss of important safeguards equipment used to achieve a safe shutdown of the plant. The condition was most limiting on Unit 2, because the both Division 2 and Division 3 were affected. Division 1 systems were operable.

A structural analysis is in progress to evaluate the effects of a seismic event on the three affected divisional coolers. The results of this evaluation may lead to a conclusion that one or more of the coolers was actually operable with the missing screws, which would affect the actual risk significance aspect of this event. A supplement to this LER will be issued to update the significance when the structural analysis is complete.

E. CORRECTIVE ACTIONS

- 1. LTS-200-19, "ECCS Cubicle Area Cooler Air Flowrate Test," will be revised to include a specific check and signoff for the presence of these and any other required fasteners inside the cooler as part of the visual inspection for materiel condition (AT# 132704-22).
- 2. Training material will be developed for this event and incorporated into continuous training for appropriate personnel (AT# 132704-25, 26, and 27).
- 3. A review of station safety related surveillances will be done to insure each has a clear requirement to conduct a general material condition review of any area opened up for the conduct of the surveillance prior to closeout (AT# 132704-28 & 29).
- 4. A structural analysis for historical operability will be performed (AT# 132704-35).

F. PREVIOUS OCCURRENCES

No previously identified instances of missing cooling coil mounting plate screws was identified. A previous instance of missing and/or loose fasteners was identified in January 2000, and regarded missing fasteners on instrument mounting brackets. Corrective actions were created to make personnel sensitive to, and to specifically check for, missing/loose fasteners during routine work (e.g., maintenance work, operator rounds, system walkdowns). This action was presented for awareness not as formal training, and was not effective in identifying this condition earlier.

G. COMPONENT FAILURE DATA

Not applicable, as no components failed in this event.

NRC FORM 366A (7-2001)