

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

September 30, 2004

10 CFR 50.73

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)(i)(B), Exelon Generation Company, (EGC), LLC, is submitting Licensee Event Report Number 04-001-00, Docket No. 050-373.

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

Respectfully,



Susan Landahl
Plant Manager
LaSalle County Station

Attachment: Licensee Event Report

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

IE22

APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004
 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. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and by internet e:mail to bjsl@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NOEB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.

LICENSEE EVENT REPORT (LER)
 (See reverse for required number of digits/characters for each block)

1. FACILITY NAME LaSalle County Station, Unit 1 2. DOCKET NUMBER 05000373 3. PAGE 1 of 3

4. TITLE Invalid Containment Isolation Valve Local Leak Rate Test Due to Inadequate Procedure

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
08	02	2004	2004	001	00	09	30	2004	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE 1 10. POWER LEVEL 100 11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)

<input type="checkbox"/>	20.2201(b)	<input type="checkbox"/>	20.2203(a)(3)(ii)	<input type="checkbox"/>	50.73(a)(2)(ii)(B)	<input type="checkbox"/>	50.73(a)(2)(ix)(A)
<input type="checkbox"/>	20.2201(d)	<input type="checkbox"/>	20.2203(a)(4)	<input type="checkbox"/>	50.73(a)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(x)
<input type="checkbox"/>	20.2203(a)(1)	<input type="checkbox"/>	50.36(c)(1)(i)(A)	<input type="checkbox"/>	50.73(a)(2)(iv)(A)	<input type="checkbox"/>	73.71(a)(4)
<input type="checkbox"/>	20.2203(a)(2)(i)	<input type="checkbox"/>	50.36(c)(1)(ii)(A)	<input type="checkbox"/>	50.73(a)(2)(v)(A)	<input type="checkbox"/>	73.71(a)(5)
<input type="checkbox"/>	20.2203(a)(2)(ii)	<input type="checkbox"/>	50.36(c)(2)	<input type="checkbox"/>	50.73(a)(2)(v)(B)	<input type="checkbox"/>	OTHER
<input type="checkbox"/>	20.2203(a)(2)(iii)	<input type="checkbox"/>	50.46(a)(3)(ii)	<input type="checkbox"/>	50.73(a)(2)(v)(C)	Specify in Abstract below or in NRC Form 366A	
<input type="checkbox"/>	20.2203(a)(2)(iv)	<input type="checkbox"/>	50.73(a)(2)(i)(A)	<input type="checkbox"/>	50.73(a)(2)(v)(D)		
<input type="checkbox"/>	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)(B)	<input type="checkbox"/>	50.73(a)(2)(vii)		
<input type="checkbox"/>	20.2203(a)(2)(vi)	<input type="checkbox"/>	50.73(a)(2)(i)(C)	<input type="checkbox"/>	50.73(a)(2)(viii)(A)		
<input type="checkbox"/>	20.2203(a)(3)(i)	<input type="checkbox"/>	50.73(a)(2)(ii)(A)	<input type="checkbox"/>	50.73(a)(2)(viii)(B)		

12. LICENSEE CONTACT FOR THIS LER
 NAME Vincent Balluff, Programs Engineering TELEPHONE NUMBER (Include Area Code) (815) 415-2575

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

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED YES (If yes, complete EXPECTED SUBMISSION DATE) NO 15. EXPECTED SUBMISSION DATE MONTH DAY YEAR

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

On 08/02/04, during the development of operator Local Leak Rate Test (LLRT) training, the LLRT Program Owner determined that an inaccurate procedural method for determining static head pressure correction factors was used in the test for the Reactor Core Isolation Cooling (RCIC) Barometric Condenser Vacuum Pump Discharge Containment Isolation check valves 1(2)E51-F028. These valves were declared inoperable and the RCIC Vacuum Pump Discharge Isolation valves 1(2)E51-F069 were closed.

The procedural deficiency was corrected, and on 09/09/04, the Unit 1 valve (1E51-F028) was retested and failed its LLRT. On 09/17/04, the valve was disassembled, the valve internals were cleaned, and the disc and spring were replaced. The valve passed its post-maintenance LLRT and was declared operable.

The cause of this event was a procedure error that has existed since 1986. Corrective actions included revising the affected procedure to correct the correction factor method, and to revise all LLRT procedures requiring head correction to require a signature for the person calculating the correction factor and for the person verifying the calculation.

LICENSEE EVENT REPORT (LER)

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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): 1/1 Event Date: 08/02/04 Event Time: 1423
 Reactor Mode(s): 1/1 Power Level(s): 100/100
 Mode(s) Name: Run/Run

B. DESCRIPTION OF EVENT

On 08/02/04, during the development of operator Local Leak Rate Test (LLRT) training, simulated LLRTs were performed in the lab to determine the viability of the training procedures and of the mock-up test rig to be used during training activities. A review of the data obtained during a test run resulted in the LLRT Program Owner questioning the method used for determining static head pressure correction factors.

LLRT of containment isolation valves is required to be performed at a differential pressure equal to or greater than the postulated containment Design Basis Accident (DBA) Peak Accident Pressure (P_a), and less than or equal to 1.1 P_a . When a volume of water is on the other side of the valve being tested (e.g., the suppression pool), the static head pressure of the volume of water must be determined and added to insure the required differential pressure is obtained during testing.

The typical method for determining the static head pressure is to obtain the water level and convert it into a pressure (psig). However, in LTS-100-38, "RCIC Vacuum Pump Discharge Isolation Valves Local Leak Rate Test 1E51-F069 and 1E51-F028," the "bubbler" method was used. A leak rate monitor is connected to an existing test connection between the two isolation valves. The inboard isolation valve is then opened and air pressure applied. When the air supply is removed and a stable pressure is achieved, that pressure equals the head pressure on the pipe opening in the suppression pool.

This method has an inherent problem in that, should the boundary isolation valve leak, the piping pressure would decrease, resulting in an inaccurate approximation of the static head pressure.

The E51-F069 and E51-F028 valves were last tested on 01/24/04 for Unit 1 and 02/02/03 for Unit 2. The LLRT results for the 1E51-F069 valves are considered valid, because a higher than expected static head pressure would force the globe valve disc away from its seat and tend to increase leakage. However, because a higher than expected pressure would provide increased sealing for check valves 1E51-F028, the LLRT results were considered invalid.

The Reactor Core Isolation Cooling (RCIC) [BN] Barometric Condenser Vacuum Pump Discharge Containment Isolation Valve 1E51-F028 were declared inoperable at 1423 on 08/02/04. Technical Specification 3.6.1.3 Action Requirement A.1 was entered, and the affected penetration flow paths were isolated by closing and deactivating the E51-F069 valve.

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

LTS-100-38 was changed to use actual suppression pool level to determine the static head correction factor, and on 09/09/04, valve 1E51-F028 was re-tested using the revised procedure. The valve failed the LLRT. On 09/17/04, the valve was disassembled, the valve internals were cleaned, and the disc and spring were replaced. The valve passed its post-maintenance LLRT and was declared operable.

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

The Unit 2 valve (2E51-F028) successfully passed its LLRT on 09/10/04.

C. CAUSE OF EVENT

The root cause of this event was an inadequate procedure, in that LTS-100-38 used an inaccurate method for determining static head pressure correction factors. This method has been in use since 1986.

D. SAFETY ANALYSIS

The safety significance of this issue was minimal. The correction factor for the static head pressure was minor, since the column of water is only about 1.5 feet. Also, although the error was non-conservative for the 1(2)E51-F028 valves, it was conservative for the 1(2)E51-F069 valves, and the total leakage for the affected penetration was acceptable.

E. CORRECTIVE ACTIONS

1. LTS-100-38 was revised to use actual suppression pool level to determine the static head correction factor (Complete).
2. All LLRT procedures that use a static head pressure correction factor will be revised to include a sign off for the person calculating the correction factor with an additional sign off for the person verifying that calculation (AT# 241004-13).

F. PREVIOUS OCCURRENCES

A review of Licensee Event Reports for the past 10 years identified no previous occurrences of a failed or invalidated LLRTs due to procedural inadequacy.

G. COMPONENT FAILURE DATA

No components failed during this event.