



**Commonwealth Edison**  
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March 18, 1980

Mr. James G. Keppler, Director  
Directorate of Inspection and  
Enforcement - Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: LaSalle County Unit 1 -  
Response to IE Inspection Report  
No. 50-373/80-04 and 50-374/80-03  
NRC Docket Nos. 50-373 and 50-374

Reference (a): G. Fiorelli letter to C. Reed  
dated February 20, 1980.

Dear Mr. Keppler:

The following is in response to the inspection conducted by Mr. I. T. Yin on January 29-31, 1980, of activities at LaSalle County Station Units 1 and 2. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. These activities are addressed in the enclosure to this letter.

Please refer any additional questions you may have on this matter to this office.

Very truly yours,

*D. L. Peoples*

D. L. Peoples  
Director of Nuclear Licensing

Enclosure

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Enclosure  
Response to Notice of Violation

The item of apparent noncompliance identified in Appendix A of the NRC letter dated February 20, 1980 are responded to in the following paragraphs:

10 CFR 50, Appendix B, Criterion VI requires, in part, that "Measures shall be established to control the issuance of documents such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality." Section 6 of the Commonwealth Edison Company Topical Report, CE-1-A, "QA Program for Nuclear Generating Station Revision 9, dated July 16, 1979, endorsed by the FSAR Chapter 17, states, in part, "A document control system will be used to assure that documents such as specifications, procedures, and drawings are reviewed for adequacy and approved for release by authorized personnel. Such documents will be distributed to and used at the locations where the prescribed activity is performed. Changes to these documents will be handled similarly and will be reviewed and approved by the same organization that performed the original review and approval, unless delegated by the originating organization to another responsible organization."

Contrary to the above, several S&L design specifications and drawings did not list the applicable Engineering Change Notices (ECN's). In addition, the ECN's were not being incorporated in the specifications and drawings in a timely manner.

Corrective Action Taken and Results Achieved

In order to resolve the apparent item of noncompliance identified, the following action has been taken:

1. ECN-1043 dated December 10, 1979 is a structural ECN. This ECN is currently included in draft Amendment 12 to Specification J-2598 which will be issued by April 7, 1980.
2. ECN-153, dated August 15, 1979 has not been incorporated into S&L drawing M-799 at this time. It will result in a new sheet to this drawing and will be issued by April 7, 1980.
3. ENC-173-LS and M-145-LS are now included in Amendment 1 to Specification J-2918. This specification is a Confirmed Specification and

will be issued for signatures by April 7, 1980.

Corrective Action Taken to Avoid Further Noncompliance

Commonwealth Edison has reviewed the facts cited for the apparent noncompliance, and on the basis of that review concludes that a special ECN listing as a part of a specification is neither necessary nor workable. Such a separate listing is not necessary because all ECN's are distributed in accordance with the same distribution used for the original specification. All recipients of the specification receive the ECN and are responsible to incorporate that ECN into the specification. The fact that no discrepancy was identified relative to the actual implementation of any ECN, supports the adequacy of the existing system.

Furthermore, the system of Conformed Specifications used on the LaSalle County project, by which the contractor, Edison Project Engineer, and the Architect Engineer (S&L) attest to the completeness of the specification, makes the revision of a specification for purely administrative purposes (i.e. addition of, or revision to an ECN status sheet) impracticable.

However, in recognition of the perceived deficiency of the existing system, and in order to facilitate the implementation of ECN's, all ECN's will be identified in the Architect Engineers (S&L) Specification Status Report which is issued monthly. This report, which also has the latest specification date, will allow field personnel to check for the existence of outstanding ECN's on any specification.

In addition, steps will be taken to achieve a more timely incorporation of ECN's.

Date When Full Compliance Will Be Achieved

Incorporation of the three ECN's which were the subject of the apparent noncompliance will be incorporated into the appropriate design document and will either be issued or in the case of Conformed Specification J-2918 issued for signature by April 7, 1980.

All ECN's which effect specifications will be incorporated into amendments in the applicable design documents and issued for signature by April 7, 1980.

The Specification Status Report, revised to clarify the status of ECN's, is expected to be available no later than May, 1980.