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Heishman - Note
Data Sheets Attached

June 25, 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 Station Unit 1
Response to IE Inspection Report
No. 50-373/80-24
NRC Docket No. 50-373

Reference (a): J. G. Keppler letter to C. Reed
dated May 29, 1980

Dear Mr. Keppler:

The following is in response to the inspection conducted by Messrs. R. Walker and S. Sheply on May 9, 1980, of activities on LaSalle County Station Unit 1. 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 these matter to this office.

Very truly yours,

L. O. DelGeorge

FOR/ D. L. Peoples
Director of
Nuclear Licensing

Enclosure

4804A

JUN 27 1980

ENCLOSURE

Response to Notice of Violation

The item of apparent non-compliance identified in Appendix A of the NRC letter dated May 29, 1980, is responded to in the following paragraphs:

> 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescibed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Commonwealth Edison Company Quality Assurance Manual, Quality Requirement No. 5.0 states in part, "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications, or checklists. These documents will assist personnel in assuring that important activities have been performed. These documents will also reference applicable acceptance criteria which must be satisfied to assure that the quality related activity has been properly carried out."
>
> Contrary to the above, on April 12, 1980, the licensee failed to provide a procedure for removal of the control rods from the reactor vessel, and consequently during this activity two control rods were not uncoupled from their drives prior to their attempted removal from the reactor vessel, resulting in potential damage to the control rods and the rod drive mechanisms.

Response:

Corrective Action Taken and Results Achieved

The Station Construction field engineer responsible for the removal of the control rods consulted with both General Electric and the Operating Department prior to starting the work. Due to the incomplete construction status the use of the GE designed control rod removal tool was impractical.

Five control rods were removed for inspection using the Rod Position Indication System (RPIS). It became apparent while removing these five control rods that when the control rod was coupled to the index tube, two men on the core plate could neither twist nor lift the control rod. After inspecting the first five control rods it was determined that all of the control rods would be removed for cleaning. At this point, after consulting with GE and using the experience gained removing the first five control rods, the Station Construction field engineer determined that the hydraulic lock created by the closed vent valves, the tight connection between the

control and spud, and the weight of the control rod/index tube combination would prevent the control rod from being moved by hand unless it was uncoupled. Based on this, an informal procedure was developed. Removal of a control rod consisted of the following steps:

A) Insert a fabricated hook into the control rod unlatching handle and pull up.

B) Manually lift the control rod about one foot to assure that it is uncoupled.

C) While it is lifted one foot attach the overhead crane and remove the control rod and place on the cleaning rack.

Ten additional control rods were removed following the steps listed above. The next two control rods 0631 and 0635 appeared to be coupled after steps A & B. When they were lifted with the overhead crane it was found that they were still coupled. At this point work was stopped. NCR 419 was written to document the damage of the two control rod drives. Through discussions with GE a formal procedure was written, Procedure #CR-R-1. This procedure was reviewed and approved by the Commonwealth Edison Station Nuclear Engineering Department. The remaining control rod drives were removed following this procedure. The damaged control rods have been returned to GE for repair. After discussion with the site resident inspector, Open Item Nos. 50-373/80-24-09 through 14 which address this issue, have been closed.

Corrective Action to Avoid Future Noncompliance

In retrospect, the Station Construction Department feels that the job was more complex than originally anticipated and a procedure should have been written. In the future, a procedure will be developed for removing any piece of equipment which was installed using a written procedure.

The interface group on site between the Station Construction Dept. and the Operating Dept. is the Start-Up Group. This group has the responsibility to coordinate betwen Station Construction and Operating. The Temporary Turnover Agreement is the mechanism used to control work on a system which has been turned over to Operating for Pre-Op testing. The Operating Dept. can place any requirements they deem necessary in the Temporary Turnover Agreement. Adherence to this program will assure appropriate interface controls are implemented prior to and during the performance of work.

Date of Full Compliance

Full compliance has been achieved.