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August 15, 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. 50-373/80-25
NRC Docket No. 50-373

Reference (a): R. F. Heishman letter to C. Reed
dated July 24, 1980

Dear Mr. Keppler:

The following is in response to the routine inspection of LaSalle County Station Unit 1 conducted by Messrs. F. Maura, L. McGregor and R. Reimann on May 20-23, 27-30, June 3-6, 10-13, 1980. 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 address any questions you may have concerning this matter to this office.

Very truly yours,

J. S. Abel
Director of
Nuclear Licensing

Enclosure

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Enclosure
Response to Notice of Violation

The items of apparent noncompliance identified in Appendix A of the NRC letter dated July 24, 1980, are responded to in the following paragraphs.

1. 10 CFR Part 50, Appendix B, Criterion V states, in part, that "Activities affecting quality shall be prescribed 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." Quality Procedure 11-2 states in Section 5.4 that "Station staff under the direction of the Station Superintendent will operate equipment and systems in accordance with approved operating procedures and as required by Preoperational or Startup test procedures."

   Startup Manual Procedure LSU 100-2, Step F.1.e., requires that Station Construction and Site QA make a detailed verification of all items in the System and Equipment list for completeness and conformance to specifications and Deficiency Reports be prepared for all deficient conditions.

   Startup Manual Procedure LSU 100-2, Step F.1.J.(4), requires that to be acceptable the turnover package shall contain a record, by location and purpose, of all jumpers, lifted wires and relay blocks that cannot be removed at turnover time.

   Startup Manual Procedure LSU 100-5, Step F.2.c, states that when a system is released for preoperational testing the Test Engineer is responsible for ensuring that preoperational blue tags and/or labels are properly applied throughout the system. Step F.2.d. requires that when a system, or part of it, is returned to Station Construction under a Temporary Turnover Agreement that tags and/or labels on the returned components be removed by the department which placed them and the appropriate tags/labels be affixed by the Station Construction Department to indicate the equipment's new status.

   Startup Manual Procedure LSU 400-1, Step F.1, requires that preoperational test procedures conform to the format and content specified in Attachment A of LSU 400-1. Attachment A, Paragraph 8, states that all of the special tools or calibrated test instruments required for performing the test be listed udner Section 8, "Test Equipment," by description, model and serial number, and verification of proper calibration.

Startup Manual Procedure LSU 500-2, Step F.2, requires that procedure changes that change the intent of the test procedure be processed using the Test Procedure Change Approval Form in Attachment C of LSU 50-2, which requires the approval of the Station Nuclear Engineering Department.

a. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual Procedures LSU 100-2 a Deficiency Report to cover a deficiency identified in Nonconformance Report No. 374 was not prepared prior to the turnover for PT-MS-101A, on May 2, 1980.

b. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual Procedure LSU 100-5 several components turned over for preoperational testing in the diesel generator systems were missing the blue preoperational tag and/or label, while others under a temporary turnover agreement had not been retagged by Station Construction to indicate the equipment's new status.

c. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual procedure LSU 400-1 during the performance of PT-PV-101, February, 1980, the vibration instrumentation being used to monitor vessel internals had not been listed as required in Section 8 of the Test Procedure.

d. Contrary to 10 CFR 50, Appendix B, Criterion V, Quality Procedure 11-2, and Startup Manual Procedure LSU 100-2 the turnover package for emergency diesel generator 0 dated April 17, 1979, did not identify jumpers installed in panel ODG 025B, terminal board 18 between terminals 54 and 84 and between terminals 50 and 82.

(1.a) Corrective Action Taken and Results Achieved

Turnover package PT-MS-101A was turned over to Operations without a deficiency report for NCR 374. This discrepancy was found during the Quality Assurance General Office (G.O.) Audit of May 20-27, 1980. As soon as the G.O. auditor found this discrepancy, a deficiency report was written for NCR 374. This is the reason why the deficiency report was dated after the turnover of package PT-MS-101A.

Corrective Action To Avoid Further Noncompliance

The G.O. Audit Team reviewed a total of forty-seven (47) turnover packages. The only discrepancy found was the missing deficiency report for NCR 374. Based on this we feel that the missing deficiency report NCR 374 is an isolated instance and no further corrective action is required. The importance of properly issuing deficiencies for NCR's has been reemphasized to involved parties.

Date of Full Compliance

Full compliance has been achieved.

(1.b) Corrective Action Taken And Results Achieved

The missing blue tags were reapplied prior to the conclusion of the inspection.

Corrective Acton To Avoid Further Noncompliance

The importance of being alert for missing blue tags and ensuring that they are reapplied when necessary was emphasized at a System Test Engineer meeting on July 23, 1980, and was the subject of a memo to the System Test Engineers and Shift Supervisors on August 5, 1980.

Startup Manual Procedure LSU 100-5 was revised August 8, 1980 to delete the requirement for applying tags when a system or a portion of a system is returned to Station Construction under a Temporary Turnover Agreement.

Startup Manual Procedure LSU 100-2 was revised on August 8, 1980, to include a reminder to reapply the blue tags following termination of a Temporary Turnover Agreement.

In addition, all site contractors are required to get authorization from the site construction department prior to initiation of any revision, rework or repair. The Construction Department will request a Temporary Turnover Agreement before such work is authorized, which will describe the equipment in question. Because all revision, rework and repair must be authorized by construction, and turnover for work acknowledged by the operating department through the temporary turnover procedure, the protection of both personnel and equipment is assured. The tag system as modified by the changes described above, provides additional assurance that field work is properly controlled. The construction authorization requirements have been the subject of thorough retraining for all involved site personnel in the last two months.

Date of Full Compliance

Full compliance was achieved on August 8, 1980.

(1.c) Corrective Action Taken And Result Achieved

As explained to the inspectors at the time of the inspection, section 8 of the test procedure is not intended to be an exhaustive listing of all test equipment utilized. Secton 8 was included in the test procedure to aid the System Test Engineer in assembling the necessary equipment. LaSalle County Station does require that all test equipment utilized be listed on the appropriate data sheet as it is used. Information recorded on this data sheet includes a description of the instrument, serial number, manufacturer and date calibrated.

Corrective Action for PT-PV-101 was completed and accepted by inspectors prior to completion of the inspection.

Corrective Action To Avoid Further Noncompliance

The applicability of Startup Manual Procedure LSU 400-1 to vendor test equipment was clarified at a System Test Engineer Meeting on June 12, 1980.

Date Of Full Compliance

Full compliance was achieved on June 12, 1980.

(1.d) Corrective Action Taken and Results Achieved

Prior to Oct. 26, 1979 existing jumpers were not listed on deficiencies in turnover packages. The jumper log is maintained in the OAD office and is there for the reference of the test engineer. Quality Assurance Audit 1-79-62 conducted 10-12-79 noted this as an Observation. In response to this Observation, OAD committed to write a deficiency for jumpers existing at the time a package is turned-over for pre-op testing. Since the "0" emergency diesel generator was turned-over prior to this date, it did not contain a deficiency for the exsiting jumpers. A deficiency has been written and cleared for this item.

Corrective Action to Avoid Further Noncompliance

A deficiency for existing jumpers has been written for all turnover packages released since 10-26-79. Startup Manual Procedure LSU-100-2 is being revised to reflect the practice of documenting jumpers with deficiencies. In addition, the jumper log is in the OAD office and lists all existing jumpers. All existing jumpers have been identified with deficiencies.

Date of Full Compliance

Full compliance will be achieved by Sept. 15, 1980 with the change to LSU-100-2.

2. 10 CFR Part 50, Appendix B, Criterion XI, states, in part, that "Test results shall be documented and evaluated to assure that test requirements have been satisfied." Quality Procedure 11-2 states in Section 5.5 that test documentation shall include any deviation from the planned test procedure. Quality Procedure 11-1 states in Section 4.3 that data sheets will be used to collect, store, and present results of construction tests.

a. Contrary to 10 CFR 50, Appendix B, Criterion XI, and Q.P. No. 11-2, the licensee failied to document the use of a clamp-on ammeter and results acheived during the testing of a immersion heater on diesel generator 1A.

b. Contrary to 10 CFR Part 50, Appendix B, Criterion XI, and Q.P. No. 11-1 the licensee failed to document the performance and results of an air blow performed on the air starting systems of the emergency diesel generators.

(2.a) Corrective Action Taken and Results Achieved

A corrected approval sheet for revision 3 to the Diesel Generator and Auziliaries Preoperational Test has been issued to document the logic utilized to classify the subject revision as a minor change.

Corrective Action To Avoid Further Noncompliance

The particulars of this item of noncompliance were discussed at a System Test Engineers meeting on July 23, 1980, and were discussed in a memo to the System Test Engineers and the Shift Supervisors on August 5, 1980. It should be emphasized that items of this nature are highly subjective. LaSalle County Station has and will continue to attempt to avoid similar situations by processing major procedure changes if any doubt exists as to whether a major or minor procedure change is appropriate.

Date of Full Compliance

Full Compliance was achieved on August 5, 1980.

(2.b) Corrective Action Taken and Results Achieved

The air start systems of the emergency diesel generators were blown out during the construction testing. However, these air flushes were not documented. The air flush for the 0 and 1A diesel generator will be repeated as soon as the additional air accumulator tanks are installed. These flushes will also be documented.

Corrective Action to Be Taken to Avoid Further Noncompliance

We have found no other instances where we have failed to document flushes and therefore feel that no further corrective action is required.

Date of Full Compliance

Full compliance will be achieved by August 22, 1980.

3. 10 CFR Part 50, Appendix B, Criterion VI, states, in part, that "Measures shall be established to control the issuance of documents such as instructions, procedures and drawings including changes thereto.... These measures shall assure that documents... are reviewed...and approved for release by authorized personnel...." QA Manual Q.R. No. 6.0, Section 6.1, requires that controls be used to assure that documents such as procedures and drawings are reviewed and approved for release by authorized personnel and requires that as-built drawings be kept updated, properly maintained and controlled. Quality Assurance Procedure Q.P. No. 11-2 designates the Station Nuclear Engineering Manager and Project Engineer as the authorized personnel for review and approval of preoperational test procedures.

   a. Contrary to 10 CFR 50, Appendix B, Criterion VI, Q.R. No. 6.0, and Q.P. No. 11-2, the licensee only reviewed the references to the documents used to perform six of ten major tests identifed in Table 14.2-20 of the FSAR for test procedure PT-VG-101 for the Standby Gas Treatment System.

   b. Contrary to 10 CFR 50, Appendix B, Criterion VI, and Q.R. No. 6.0, as-built drawings for emergency diesel generator 1B control panel do not agree with the actual wiring on the terminal boards as follows:

      (1) Terminal board 14, terminal 26 has 4 wires terminating at this point. Drawing IE 14683AG indicates 3 wires connected to terminal number 26.

(2) Terminal board 13, terminal 8 has 4 wires terminating at this point. Drawing IE 14683AG indicates 3 wires connected to terminal number 8.

(3) Terminal board 9, terminal 10 has 2 wires terminating at this point. Drawing IE 14683AE indicates 1 wire connected to terminal No. 8.

(3.a) Corrective Action Taken and Results Achieved

The LaSalle County engineering project engineer will complete the review of the referenced operating surveillance procedures which require data to be recorded or that are essential to verify the design or satisfy FSAR commitments. In the case of Procedure PI-VG-101, Rev. 0, the engineering group at the time of its initial review did provide comments indicating areas requiring change which were in part addressed in referenced station procedures. The engineering group conditioned its acceptance on resolution of those comments. A reassessment of station procedures referenced in PT-VG-101 will be completed by August 15, 1980.

Corrective Action to Avoid Further Noncompliance

The LaSalle County engineering group will review station surveillance procedures referenced in a pre-operational test procedure which require data to be taken, that are essential to verify the design or to satisfy an FSAR commitment. Completion of this review will be noted on the approval sheet of each pre-operational test procedure by the engineering group. This review will be completed for all pre-operational test (PT) procedrues prior to "Acceptance of Test" by the engineering group.

Date of Full Compliance

The corrective action relative to PT-VG-101 will be completed by August 15, 1980. Completion of the review for other PT procedures will be as described above.

(3.b) Corrective Action Taken and Results Achieved

For safety-related panels, it is the LaSalle County Construction group's policy that the internal wiring of vendor supplied panels is not physically checked during construction tests. The wiring is functionally checked and the schematic diagram is verified to be accurate. The location of the wires noted above in no way degraded their intended operation. The apparent discrepancy is not the result of incorrect panel wiring; but rather, it results from the fact that extra leads having no design function and not shown on the schematic diagrams were provided.

These anomalous leads will be reviewed and removed from the panel which is the subject of this report and for all other panels where this problem is discovered to exist.

Corrective Action to Avoid Further Noncompliance

As indicated in H.P. Foley's Work Instruction 500, Cable Terminations (paragraph 3.7.5), prior to "Release for Operations" the Q.C. Department will perform an inspection of safety-related panels. Items for which panels will be reviewed are:

1. Number and location of instruments and terminal blocks.
2. Terminal block wiring.
3. Correct lugging and crimping of cables.
4. Any missing or damaged parts.

Date of Full Compliance

The panel inspections will be completed prior to fuel load of Unit 1.