

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-373/81-07

Docket No. 50-373

License No. CPPR-99

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: La Salle County Station, Unit 1

Inspection At: La Salle Site, Marseilles, IL

Inspection Conducted: January 26-29, February 2-6, 18-20, 23, and
March 6, 1981

Inspectors: *F. Maura*
F. Maura 6-1-81
(January 26-29, February 18-20,
23, and March 6, 1981)

M. Ring
M. Ring 6-1-81
(February 20, 1981)

R. L. Spessard
R. L. Spessard 6-1-81
(February 23, 1981)

K. Connaughton
K. Connaughton 6-1-81
(February 2-6, 18-20,
and 23, 1981)

Approved By: *A. N. Jackiw*
A. N. Jackiw, Acting Chief 6-1-81
Test Program Section

Inspection Summary

Inspection on January 26-29, February 2-6, 18-20, 23, and March 6, 1981
(Report No. 50-373/81-07)

Areas Inspected: Routine announced inspection to witness preoperational
test in progress; review preoperational test procedures; and review

previous open items. The inspection involved 125 inspector-hours onsite by four NRC inspectors including ten inspector-hours onsite during off-shifts.

Results: Of the three areas inspected, no apparent items of noncompliance were identified in one area. Two apparent items of noncompliance were identified in two areas (failure to calibrate test instrument - Paragraph 4; failure to maintain adequate cleanliness - Paragraph 2).

DETAILS

1. Persons Contacted

- **B. Stephenson, Project Manager
- L. Burke, Site Project Superintendent
- W. Donaldson, Assistant Site Project Superintendent
- E. Spitzner, Startup Coordinator
- *R. Holyoak, Station Superintendent
- **R. Diederich, Operating Assistant Superintendent
- ***R. Bishop, Administrative Assistant Superintendent
- ***K. Kyrouac, QA Engineer
- *G. Cooper, Master Instrument Mechanic
- C. Schroader, Technical Staff Supervisor
- **H. Hentschel, Assistant Technical Staff Supervisor
- *W. Huntington, Assistant Technical Staff Supervisor
- M. Richter, Technical Staff Engineer
- K. Brown, GE Startup Manager
- H. Dromhiller, GE Startup Engineer

The inspectors also interviewed other licensee employees including members of the technical, maintenance, and construction staff.

*Denotes those attending the exit interview of February 23, 1981.

**Denotes those attending the exit interview of March 6, 1981.

***Denotes those attending both exit interviews.

2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (373/81-15-06); 373/80-15-07): Instrument Calibration and Loop Check Status of Equipment Used in Preoperational Testing. The inspector conducted a review of corrective action taken in accordance with the licensee's response letter dated July 7, 1980. The review consisted of interviews with technical staff personnel responsible for implementing the corrective action, an audit of re-calibration and loop check results (referenced by Work Request number), and independent verification that when essential test data is adjusted to reflect the as found instrument error, acceptance criteria were still met. This independent verification was not performed for preoperational testing which was to be repeated for other reasons. The following re-calibration and/or loop check results were examined and where applicable, used for independent verification of test data acceptability:

Preoperational Test/Work Request Nos.

PT-VP-102/4704, 4705, 4754-4762
PT-RD-102/4682-4685, 4839, 4840
PT-RR-101/5224, 5248
PT-VJ-101/4710-4715, 5196, 5197
PT-VO-101/5167-5170
PT-VE-101/5307-5315
PT-DG-101A/4997, 4998, 507, 5048, 5142, 5144
PT-DG-101B/50-13, 5143

PT-VG-101/5092, 5093
PT-VC-101/4645, 5175, 5178
PT-VR-101/5179
PT-MS-101A/4870-4881
PT-VY-101/5006-5008, 5012

The inspector determined that the licensee's acceptance of essential data acquired by instruments not calibrated within 18 months prior to use in tests or not loop-checked prior to use in tests is justified on the basis of recalibration and/or loop check results. At the time of this inspection, several calibrations and/or loop checks had not been completed.

The inspector's findings that the licensee's corrective action taken to date has been thoroughly and correctly implemented provide assurance that the outstanding corrective action will be so implemented.

(Closed) Open Item (373/80-36-04): The inspector reviewed Section 10.5.C of PT-CM-101 containment monitoring as the test of that portion of containment monitoring which meets the leak detection requirements of the proposed technical specifications. The inspector determined that the procedure meets the requirements of the FSAR and Regulatory Guide 1.68 for the leak detection portion.

(Open) Open Item (373/80-36-03): This item consisted of two parts. The first part involved Test Procedure PT-FC-101 not containing a Section 10.5.K which dealt with a portion of the leak detection system as it relates to the spent fuel pool. The inspector reviewed Revision 9 of PT-FC-101 and determined that it satisfied the requirements of Regulatory Guide 1.68 and the FSAR. This part of the item is now closed.

The second part involved Test Procedure SD-WC-101E not specifying acceptance criteria consistent with the proposed technical specification limits of 25 GPM total leakage or 20 GPM identified leakage. These areas are still not complete and remain open items.

(Closed) Open Item (373/80-15-04): Documentation of problems found on support equipment not yet turned over for preoperational testing. The inspector verified that LSU 500-1, Revision 4 dated April 28, 1980 requires the Test Engineer to document such equipment malfunctions in Section 13.2 of the test procedure and to evaluate the effect of the problem on his test before resuming the test.

(Closed) Noncompliance (373/80-15-05): Timeliness of documentation of deficiencies noted during testing. The inspector verified that the licensee took the corrective action as stated in their letter (D. L. Peoples to J. G. Keppler) of June 6, 1980.

(Closed) Noncompliance (373/80-25-04 and 373/80-36-01): Inadequate control of jumpers. The inspector verified that licensee took the corrective action as stated in his letters (J. S. Abel to J. G. Keppler) of August 15, 1980 and (L. O. Del George to J. G. Keppler) of November 25, 1980.

(Open) Noncompliance (373/80-15-11): Lack of a program to maintain cleanliness. Following the issuance of this item of noncompliance in May 1980, the licensee proceeded to clean the specific example cited in our report, however, no program was developed to maintain adequate housekeeping. As a result, the inspector found the station's cleanliness had deteriorated badly during this inspection. The following problems were noted:

- a. Diesel Generator 1A Control Panel 1DG02JA - The doors were found open. Inside the cabinet was found a milk container, a cloth hat laying over devices 51V2 and V3, a mask filter laying over 81 protective relays, and considerable dust over electrical components.
- b. HPCS Panel H22-P024 - In addition to the overall dirty condition of the panel and instruments, a 3/8" x 3' diameter plywood panel and a six foot long pipe were laying against the panel.
- c. RHR Pump Room - Water from floor above was running into cable trays 1019A 1BP, 1019B 1BC, and 1019C 1BK.
- d. LPCS Instrument Panel H22-P001 - Sign of water having been sprayed against instruments was noted as several turnover tags, etc. had water deteriorated, large cardboard stored behind panel on top of cables. Bottom tray full of water.
- e. RCIC Panel H22-P029 - Workers had just finished concrete core drilling next to panel and had sprayed concrete-water slurry against instruments (panel not protected during drilling). Bottom tray full of water and trash.
- f. ESF Division 2 Cable Trays - Pint size milk containers on top of cables in tray 1037B 1BC. A weld rod oven and a welding power supply were laying on top of cables on tray 1038A 1BC.
- g. Control Room - White material laying in relays for RPS trip system B2. Considerable dust over relay contacts, one empty container of silicone rubber and paper trash in RPS panel. Sheet of plywood 3/4" x 2' x 4' and some trash behind reactor control board.

The lack of a program to maintain cleanliness as required by ANSI N45.2.2 and N45.2.3 is inconsistent with the QA Manual and with 10 CFR Part 50, Appendix B, Criterion II and XIII and is considered to be an item of noncompliance (373/81-07-01).

These items were discussed with LaSalle Station Project Management on February 23, 1981. As a result, Project Management developed Project Procedure 81-2, "LaSalle Station Housekeeping Procedure" which the inspector reviewed on March 6, 1981. The licensee agreed to incorporate the inspector's comments. In addition, the inspector verified that steps were being taken to correct the previously identified deficiencies. Based on the actions being taken by Project Management to correct the poor housekeeping condition which has plagued the La Salle Station for years, the inspector stated no response to this item of noncompliance was required. The inspector also stated that the results of future

inspections will determine whether escalated enforcement action may be appropriate.

3. Review of Preoperational Test Procedures

Procedure PT-1N-101 (Revision 0) "Primary Containment Instrument Air" was reviewed against the FSAR, the P&ID's and Regulatory Guide 1.80. The following problem areas were noted:

- a. Section C.3 of Regulatory Guide 1.80 states, "Test air dryer units for proper functioning...verify operation at maximum flow rates. Verify appropriate differential pressures and proper operation of pressure switches, high and low pressure alarms, safety and/or relief valves, bypass valves and alarms and resets." The inspector questioned the extent to which PT-1N-101 satisfied this section of Regulatory Guide 1.80. This is an open item (373/81-07-02) pending further discussion with the licensee.
- b. Section C.4 of Regulatory Guide 1.80 states, "Verify by test that the instrument air system will meet specifications, relating to flow, pressure and temperature of product air." The inspector questioned how PT-1N-101 satisfied Section C.4 with respect to flow and temperature. This is an open item (373/81-07-03) pending further discussion with the licensee.

4. Preoperational Test Witnessing

a. Procedure and Test Results

The full core scrams were performed in accordance with approved test procedures. The tests did not include a scram with the water in the instrument volume at the scram set point. The licensee plans to perform this test after completion of a modification to the scram discharge volume. During the first test the scram recorder failed to operate properly in the Auto position and was replaced with the Unit 2 recorder. However, during all subsequent tests the Auto operation of the recorder was not tested and the recorder was manually started shortly before each scram. Scram testing from the instrument volume and Auto operation of the recorder are considered an open item (373/81-07-04) pending satisfactory completion by the licensee.

Whenever a high demand was placed on CRD A pump the pump would trip on low suction pressure. Relocation of the pressure tap did not improve the condition. This is an open item (373/81-07-05) pending licensee corrective action.

A preliminary review of test results showed rod 50-51 to have the longest scram time (1.95 seconds) which is within the acceptable limit.

b. Instrument Calibrations

The inspector reviewed the calibration records on equipment required for the test and noted the timing recorders (Unit 1 and 2) had not been calibrated. Failure to calibrate the timing device prior to its use is contrary to 10 CFR 50, Appendix B, Criterion XII and Quality Assurance Program Quality Requirement 12.0 and is considered to be an item of noncompliance (373/81-07-06). Upon notification by the inspector, the licensee proceeded to calibrate both recorders. The inspector reviewed the calibration results and noted the recorder's speed to be within the manufacturer's stated accuracy (± 1 percent) after approximately the first 0.1 second of travel. Therefore, no correction has to be applied to test results obtained where the recorder is started manually shortly before the scram. The licensee is aware that results obtained with the recorder in Auto may not be acceptable if the results are too close to the limit. As a result of the calibrations performed the inspector stated no response to this item of noncompliance is required.

5. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) on February 23 and March 6, 1981. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the statements of the inspectors with respect to the items of non-compliance (Paragraphs 2 and 4).