



**Commonwealth Edison**  
LaSalle County Nuclear Station  
Rural Route #1, Box 220  
Marseilles, Illinois 61341  
Telephone 815/357-6761

December 6, 1989

**Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555**

Dear Sir:

Licensee Event Report #89-026-00, Docket #050-373 is being submitted to your office in accordance with 10CFR50.73(a)(2)(iv).

*for* G. J. Diederich  
Station Manager  
LaSalle County Station

GJD/DAC/kg

Enclosure

xc: Nuclear Licensing Administrator  
NRC Resident Inspector  
NRC Region III Administrator  
INPO - Records Center

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1)

Docket Number (2)

Page (3)

LaSalle County Station Unit 1

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Title (4) Inadvertent Primary Containment Isolation Actuation Due to Inadequate

Logic Setup During Modification Installation

Event Date (5)			LER Number (6)				Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)	
11	1	0   6   8   9	8   9	0   2   6	0   0	1   2	0   6   8   9			0   5   0   0   0	
										0   5   0   0   0	

OPERATING MODE (9)

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)

POWER LEVEL (10)	0   0   0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input checked="" type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
		<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
		<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text)
		<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
		<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
		<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

Name	TELEPHONE NUMBER
Don Crowl, Regulatory Assurance, extension 2860	AREA CODE: 8   1   5   3   5   7   -   6   7   6   1

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS
D				N					

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> Yes (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	Expected Submission Date (15)	Month	Day	Year
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 6, 1989 at 1919 hours with Unit 1 Defueled, a Primary Containment Isolation System (PCIS) Group 2, 6 and 7 isolations occurred while clearing an out-of-service in accordance with LaSalle Administrative Procedure LAP-900-4, "Equipment Out-of-Service Procedure." The PCIS Group 2, 6 and 7 resulted in closure of 1VP113A Drywell Cooler 1A Inlet Inboard Isolation valve, 1VP114A Drywell Cooler 1A Outlet Inboard Isolation valve, the trip of 1VP01PA Primary Containment Chiller pump and 1VP01CA Water Chiller unit on low flow. All other components were isolated and out-of-service due to scheduled refueling outage work.

The PCIS Group 2, 6 and 7 isolations occurred because the Trip Output and Status switches on the Rosemount reactor level transmitter trip units were not in their required position. When the outage was cleared, jumpers were removed that bypassed the contacts for the isolation logic and resulted in an isolation.

The Trip Status and Trip Output switches were repositioned and the PCIS logic was reset without any further problems.

The Primary Containment Cooling Water system was on at the time to support work in the drywell and was not required for plant operation during this event.

The event is being reported pursuant to the requirements of 10CFR50.73(a)(2)(iv) due to the actuation of an Engineered Safety Feature system.

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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

A. CONDITION PRIOR TO EVENT

Unit(s): 1                      Event Date: 11/16/89                      Event Time: 1919 Hours  
 Reactor Mode(s): Defueled                      Mode(s) Name: Defueled                      Power Level(s): 0%

B. DESCRIPTION OF EVENT

On November 6, 1989 at 1919 hours with Unit 1 Defueled, a Primary Containment Isolation System (PCIS, PC) [JM] Group 2, 6 and 7 isolation occurred while clearing an out-of-service in accordance with LaSalle Administrative Procedure LAP-900-4, "Equipment Out-of-Service Procedure." This was done following the replacement of the Static-O-Ring reactor level switches with Rosemount level transmitters and trip units. The PCIS Group 2, 6 and 7 resulted in closure of 1VP113A Drywell Cooler 1A Inlet Inboard Isolation valve, 1VP114A Drywell Cooler 1A Outlet Inboard Isolation valve, the trip of 1VP01PA Primary Containment Chiller pump and 1VP01CA Water Chiller unit on low flow. All other components were isolated and out-of-service due to scheduled refueling outage work.

Prior to the event Unit 1 was defueled for a planned refuel outage. The Residual Heat Removal (RHR, RH) [BO] Shutdown Cooling system was isolated and the Primary Containment ventilation loop 1A was in operation to support work activities in the drywell during the outage.

On October 28, 1989, all outages associated with the Reactor Level Static-O-Ring switch replacement were authorized to be placed back in service following the completion of this work.

The Unit 1 Outage Shift Control Room Engineer (SCRE) and an Auxiliary Shift Supervisor (both licensed Senior Reactor Operators) both reviewed the outages and determined the sequence required to place the new Rosemount reactor vessel level transmitters back in service. The SCRE developed a written guideline to aid in coordinating the effort for clearing the outages and prevent inadvertent Engineered Safety Feature system (ESF) actuations. The guideline for clearing the outages was written to coordinate partially clearing the outages to allow testing of the new Rosemount level transmitters in preparation for reactor vessel flood-up following the vessel decontamination.

The electrical construction testing was completed for the new reactor level transmitter logic installation, which provides input to both the Reactor Protection System (RPS, RP) [JC] and the Primary Containment Isolation system (PCIS) [JM] per Electrical Construction Test Procedure, ECTP 19-Control Circuits. This test involved inspecting the new devices installed per the modification for physical damage, proper labeling and terminations.

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TEXT Energy Industry Identification System (EIIIS) codes are identified in the text as [XX]

B. DESCRIPTION OF EVENT (Continued)

On October 28, 1989 the Operating Department partially returned to service the outages associated with the 1B21-W402A/B/C/D and 1B21-W403A/B/C/D reactor water level transmitters. This was to provide power to the master trip unit meters for calibration per LaSalle Instrument Surveillances LIS-WB-101A/B, "Unit 1 Reactor Vessel Low Water Level 3 Scram Trip Logic A1 & A2 and RHR (Shutdown Cooling Mode) Isolation Refuel Calibration" and LIS-MS-107A/B, "Unit 1 Reactor Vessel Low Water Level 1 and Level 2 Isolation Instrumentation Channel Calibration." Only a partial calibration was performed to verify the meters associated with the Master Trip Units would respond correctly to a given input signal; no functional check of the logic was completed at this time. Another partial return to service was authorized to allow the 1B21-W402A/B/C/D and 1B21-W403A/B/C/D level transmitters to be backfilled and locally calibrated using a portable dead weight test pump per LIS-WB-107A/B. Again only a partial calibration was performed to verify the level transmitter would respond correctly to a given input signal. This partial calibration process was done to allow verification of proper instrument trend response when the reactor vessel was refilled. Completion of the calibration required removal of all outages.

The Instrument Maintenance personnel completed their partial calibrations and on November 4, 1989, the Operating Department commenced flood-up of the Unit 1 reactor vessel in accordance with LaSalle Operating Procedure LOP-FC-17, "Filling the Reactor Well and Dryer/Separator Pit from the Suppression Pool through the RHR or Low Pressure Core Spray (LPCS, LP) [BM] System." During the flood-up Technical Staff and Instrument Maintenance Department personnel verified that the newly installed Rosemount level instrumentation was responding correctly. No problems were found at this time.

Once the Unit 1 reactor vessel was filled to approximately 12 inches below the vessel flange all the Static-O-Ring level switch replacement outages were authorized to be completely cleared or returned to service in accordance with LAP-900-4. The isolation boundaries associated with the outages were returned to service in the following sequence:

1. The mechanical portion which consisted of the instrumentation valves.
2. The power supplies to the new Rosemount level transmitters and logic.
3. The retermination of leads for the new instrumentation logic.
4. The removal of jumpers to prevent actual isolation during the replacement of the Static-O-Ring switches.

Prior to the completion of the clearing of the Static-O-Ring level switch replacement outages, the new Rosemount master trip units (a trip unit with a level indicating meter which receives its input directly from the level transmitter) were verified indicating upscale and all trip indicating lamps were de-energized. Also no PCIS logic status lights were energized prior to clearing the outages. During the removal of the jumper on panel 1PA14J, Division 2 Isolation Logic Auxiliary Relay Cabinet, at terminal points AA-15 to DD-89, a Group 2, 6 and 7 PCIS isolation occurred. This jumper bypassed the Division 2 PCIS Group 2 inboard isolation valve logic. Because the Rosemount master and slave trip units (The slave trip units do not have a level indicating meter and receive their level input from the

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B. DESCRIPTION OF EVENT (Continued)

master trip unit.) were not completely calibrated, it was not identified that the slave trip units were in the tripped condition when the jumper was removed. (See attached diagram.) Upon further investigation the master trip units associated with reactor level 3 trips were also found in the trip condition. This prevented resetting the logic, alarms and resulted in the operation of valves associated with the RPS and PCIS logic.

When the Division 2 PCIS Group 2 isolation logic initiated it resulted in closure of 1VP113A Drywell Cooler 1A Inlet Inboard Isolation valve, 1VP114A Drywell Cooler 1A Outlet Inboard Isolation valve, the trip of the 1VP01PA Primary Containment Chiller pump and 1VP01CA Water Chiller unit on low flow. Prior to resetting the isolation logic all the relay panels associated with the PCIS and Reactor Protection System logic were inspected to determine which relays were energized or de-energized. The following relays were found in their tripped de-energized state:

- a. Relays 1C71-K6A/B/C/D Reactor Level 3 RPS and PCIS Group 6 and 7 logic
- b. Relays 1B21H-K1B & C Reactor Level 2 PCIS logic

PCIS Group 6 and 7 logic status lights were energized.

These relays were de-energized due to the outage to support the Static-O-Ring switch replacement. Automatic initiations of Engineered Safety Feature components were prevented by jumpering across contacts that would normally open when these relays were de-energized. When power was restored to these relays while clearing the out-of-services associated with them, the relays should have energized providing all trips associated with opening the contacts which supply power to these relays were reset. Once the relays were energized and all associated contacts that were jumpered are closed, the jumpers could have been removed because they were no longer necessary.

De-energizing relays 1C71-K6A/B/C/D result in the following actions under normal circumstances:

- a. A full reactor scram and PCIS Group 6 and 7 isolations and Panel 1H13-P601 Control Room alarms

- B203, "CHAN A1 REACTOR AUTO SCRAM"
- B505, "CHAN A1/B1 RX VESSEL WTR LVL 3 LO"
- B211, "CHAN A2 REACTOR AUTO SCRAM"
- B509, "CHAN A2/B2 RX VESSEL WTR LVL 3 LO"
- B303, "CHAN B1 REACTOR AUTO SCRAM"
- B311, "CHAN B2 REACTOR AUTO SCRAM"

- b. Panel 1H13-P601 RPS bus A and B scram solenoid group lights de-energized.

- c. Process Computer alarms

- D978, "LO RX WTR LEVEL DIV A1"
- D985, "LO RX WTR LEVEL DIV A2"
- D979, "LO RX WTR LEVEL DIV B1"
- D984, "LO RX WTR LEVEL DIV B2"

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B. DESCRIPTION OF EVENT (Continued)

d. Control Room back panel PCIS status lights DS31, 33 and 36 energized.

De-energizing relays 1B21H-K1B and C result in the following actions under normal circumstances:

- a. PCIS Group 2, 3, 4 and 5 isolations  
Panel 1H13-P601 Control Room alarms

F504, "CHAN A1/A2 MSIV ISOL TRIP"  
E504, "CHAN B1/B2 MSIV ISOL TRIP"

- b. Panel 1H13-P603 Control Room alarms

B511, "CHAN A2/B2 RX VESSEL WTR LVL 1 LO-LO-LO"  
A210, "CHAN A1/B1 RX VESSEL WTR LVL 1 LO-LO-LO"

The Operating personnel completed clearing the outages for the Static-O-Ring reactor level switch replacement without any further problems. Once the inspection of all the relays associated with the RPS and PCIS logic was completed and the outage was completely cleared, the Operating personnel attempted to reset the PCIS logic; no change in relay status was observed. The Shift Engineer (SE, licensed Senior Reactor Operator) instructed the Operating personnel to prepare and hang another outage to defeat the PCIS Groups 2, 3, 4 and 5 isolation logic from initiating due to troubleshooting the reactor level 2 logic. The Instrument Maintenance personnel were then requested to troubleshoot reactor level 2 and 3 Rosemount trip units to determine why the Operator was unable to reset the logic. After performing a calibration and inspection of the master and slave trip units it was discovered that the Trip Status switch S1 and Trip Output switch S2 located on the printed circuit board for these trip units were in the wrong position. (See attached diagram.) The Trip Status switch S1 was found in the "normal" position (should have been in the reverse position) and the Trip Output switch S2 was found in the "reverse" position (should have been in the normal position).

The Trip Output switch in the "normal" position, controls the contact in the logic for the Master or Slave trip unit which opens to de-energize the RPS or PCIS relay that will initiate a scram or isolation. The Trip Status switch in the "reverse" position, controls the trip indicating LED located on the master or slave trip unit which should energize to indicate a trip during a trip condition. The Trip Output and Trip Status switches operate independently of each other, therefore the Trip Status light (LED, Light Emitting Diode) may not be lit when the Trip Output relay is in the trip condition. The setting of the Trip Output and Trip Status switches are all a function of whether the system is energized to initiate or de-energize to initiate. The normal configuration is set to de-energize to initiate.

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B. DESCRIPTION OF EVENT (Continued)

The Trip Output and Status switches were repositioned and calibrations completed in accordance with LIS-MS-107A/B and LIS-MB-101A/B without any further problems.

This event is reportable pursuant to the requirement of 10CFR50.73(a)(2)(iv) due to an actuation of an ESF system.

C. APPARENT CAUSE OF EVENT

The root cause of this event was that the modification was installed with the Master and Slave trip unit Trip Output or Status switches improperly set. No written instructions were provided in the modification package on how to set the switches. This caused the person in charge of the work to authorize restoring the level instrumentation to service in an abnormal condition. This allowed the level indicating meters on the Master Trip units to indicate upscale with the trip contacts open in the tripped condition with no trip indicating light illuminated on either the Master or Slave trip units. When the Master and Slave trip units were inspected prior to clearing the outage no trip lamps were illuminated. The jumpers were removed across the open contacts while clearing the outage resulting in de-energizing trip logic relays for reactor level 2 and 3 RPS and PCIS logic. This caused PCIS Group 2, 6 and 7 isolations to occur.

A contributing factor was that the Instrument Maintenance personnel were unable to perform a complete calibration of the new Rosemount reactor level instrumentation and logic until the outage for installing this instrumentation was cleared. Partial calibrations were performed on the level indicating meter and transmitters to verify proper response during the reactor vessel floodup. No functional testing of the level instrumentation logic was performed at this time, therefore alarms and relays were not tested preventing the Instrument Maintenance personnel from identifying a potential problem prior to returning the Rosemount reactor level instrumentation to service.

An additional contributing factor was the Operating personnel clearing this outage were not required and did not utilize the electrical schematics associated with preparing the outage to determine which alarms should have cleared in the Control Room and which relays should have energized. The outage checklist did not provide special instructions to the Operators clearing the outage to identify potential problems that could occur when clearing the outage, such as alarms not clearing or relays not energizing. This could have allowed them to discover that a trip existed prior to removing the jumper which bypassed the trip.

Another contributing factor was the Operating personnel did not realize what modification or post maintenance testing was required for the new Rosemount reactor level instrumentation. They were under the impression the testing required for this modification was done and would operate properly when returned to service.

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D. SAFETY ANALYSIS OF EVENT (Continued)

The Primary Containment Chill Water (PCCW) system provides chilled water to the Primary Containment cooling units to meet the cooling load requirements in the drywell. The system cooling capacity is based on heat losses from piping and valves, equipment, reactor pressure vessel, and unidentified steam leakages.

The safety significance of this event is minimal since the unit was defueled. At the time of the isolation, most of the equipment affected was already in the isolated condition due to scheduled outage work that was in progress. This type of modification work would not be done in other than outage conditions. The problem with the trip units would have been corrected prior to declaring these instruments operable.

E. CORRECTIVE ACTIONS

The Operating personnel on shift prepared another outage in accordance with LAP-900-4 to bypass RPS and PCIS reactor level 2 and 3 trips. The outage was completed and logic reset.

Once the PCIS logic was reset the 1VP113A Drywell Cooler IA Inlet Inboard Isolation and 1VP114A Drywell Cooler IA Outlet Inboard Isolation valves were reopened. The 1VP01PA Primary Containment Chiller Pump and the 1VP01CA Water Chiller unit was restarted.

The Instrument Maintenance Department was requested to troubleshoot and calibrate the Rosemount reactor level instrumentation in accordance with LIS-MS-107A/B and LIS-NB-101A/B. During the performance of the calibration the Instrument Maintenance personnel determined the problem was the 1B21-N703A/B/C/D Master and 1B21-N704B/C Slave trip unit Trip Output and Status switches being in the wrong position. The Trip Output and Status switches for each of the trip units were repositioned and the calibration was completed without any further event.

A review will be done to determine if additional training is needed on vessel instrumentation and available indications which can aid Operating personnel in the Control Room in determining the actual status of RPS or PCIS logic. Action Item Record (AIR) 373-200-89-10801 will track the progress of this review.

A revision of the LaSalle Administrative Procedure LAP-900-4, "Equipment Out-of-Service Procedure" will be done to include the following revisions:

- (1) Add a caution to consult with the Technical Staff or the working department for assistance in preparation, installation and removal of outages when technical expertise is required to prevent an Engineered Safety Featured system actuation. This revision will assist in developing special instructions when clearing an outage.
- (2) Provide more guidance to the person in charge of the work to insure the work is completed such that equipment damage or an Engineered Safety Featured system actuation would not result when the outage is cleared or equipment is restored to service. If any special instructions are required the working department must provide them to the Operating Department.

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E. CORRECTIVE ACTIONS (Continued)

- (3) The person in charge of the work will be required to insure that testing of logic has been completed, when possible, prior to the authorization of fully returning the equipment to service. Consideration should be given to partial clearing or temporary lifting the outage to accomplish this. Any untested logic must be reported to the Operating Department.
- (4) Concerning outage clearances, including temporary lifts and partial clearances a statement will be added to consider returning to service one channel at a time. This is to accomplish testing or allow the system to be placed back in service to troubleshoot without causing an Engineered Safety Featured system actuation.

AIR number 373-200-89-10802 will track the progress of this review.

A General Information Notification (GIN) will be developed to review this event with Operating, Maintenance, Substation Construction, Operational Analysis Department, Engineering and Construction Department and Technical Staff personnel. AIR number 373-200-89-10803 will track the progress of this review.

F. PREVIOUS EVENTS

LER Number	Title
373/84-015-00	Inadvertent Group 2 and 4 Containment Isolation
373/86-011-00	Personnel Error Primary Containment Isolation
373/86-037-00	Group 2 and Group 4 Containment Isolation Due to Inadequate Out-of-Service
374/87-006-00	Unplanned Engineered Safety Feature Actuation During Modification Testing Caused by Personnel Error

G. COMPONENT FAILURE DATA

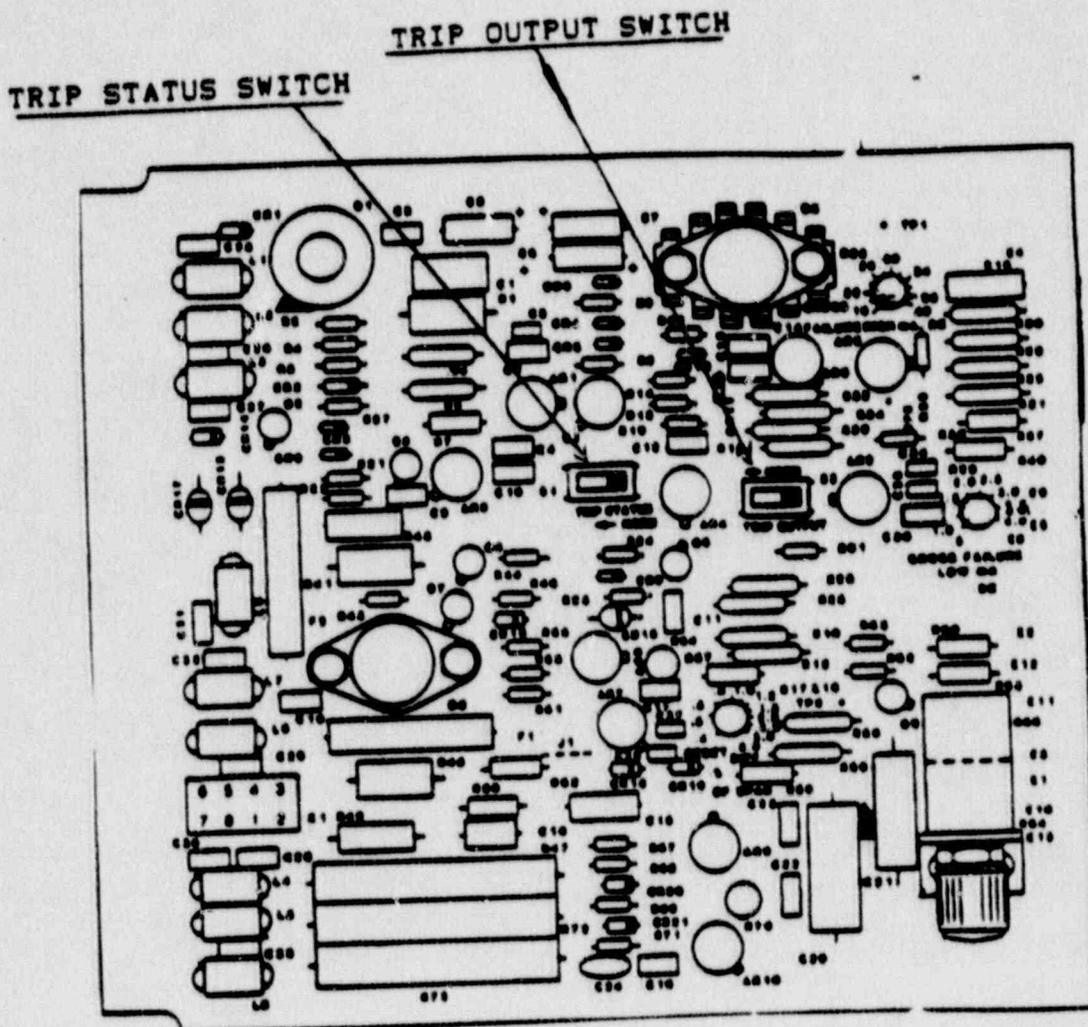
None.

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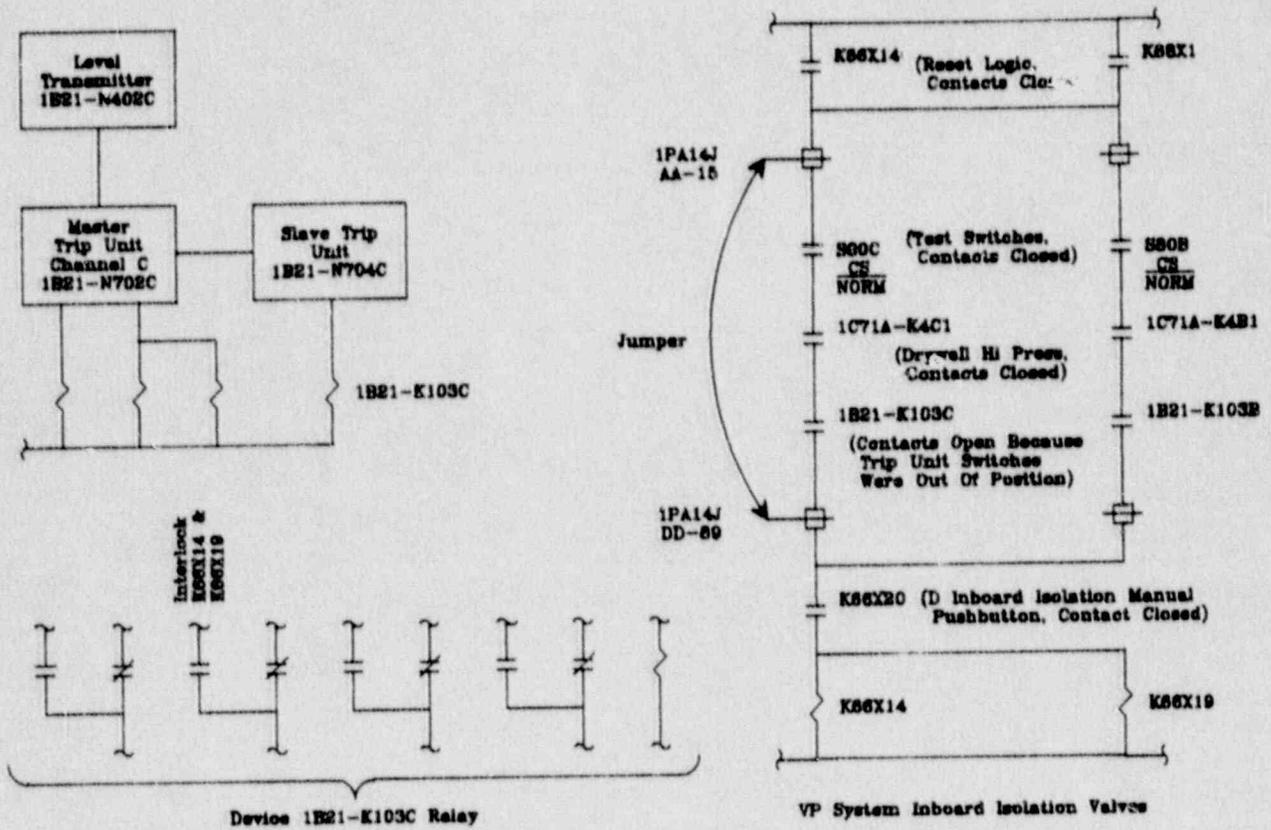
Drawing of the printed circuit board for a typical Master or Slave trip unit showing the "Trip Status" and "Trip Output" switches.

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Simplified Schematic Diagram of the Channel C Level 2 Logic