

FEB 14 1990

Docket No. 50-373  
Docket No. 50-374

Commonwealth Edison Company  
ATTN: Mr. Cordell Reed  
Senior Vice President  
Post Office Box 767  
Chicago, IL 60690

Gentlemen:

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2, RESPONSE TO INSPECTION  
REPORT NOS. 50-373/86004 AND 50-374/86004

References: (a) Letter dated February 28, 1986, C. J. Paperiello to  
Cordell Reed  
(b) Letter dated April 11, 1986, D. L. Farrar to J. G. Keppler  
(c) Letter dated April 15, 1987, C. M. Allen to A. B. Davis

In Reference (a), the NRC brought to your attention a violation regarding the lack of electrical supervision for the Unit 1 and Unit 2 local fire alarm circuits and the Unit 1 and Unit 2 control room fire detection system visual alarm annunciator circuits. Reference (b) documented Commonwealth Edison Company's (CECo) position that a violation was not warranted. In Reference (c), CECo reiterated their position and provided additional historical correspondence for review by NRC Headquarters.

The NRC has completed its review of this issue. Based on our review of your referenced submittals, we have concluded that the example of violation concerning your failure to provide electrical supervision for local fire alarm circuits remains a violation. Your position that the installation of electrical supervision for local fire alarm circuits is not required is unacceptable for two reasons. First, Section E.1.(b) of Appendix A to Branch Technical Position (BTP) APCS 9.5-1 (August 23, 1976) states: "Fire detection system should give audible and visual alarm and annunciation in the control room. Local audible alarms should also sound at the location of the fire."

This section of the BTP indicates that the staff did not consider the local alarms to be "supplemental" in the sense that they were simply in addition to the control room alarm but basically not essential. Specifically, the staff considered the local alarm to be an integral part of the alarm/annunciation system which served to warn regular employees and assist the fire brigade in their response notification.

FEB 14 1990

Second, Section 2441.a of NFPA 72D-1975 states: "The electrical supervision shall include circuits for operating alarm sounding devices and appliances except:

- a. A circuit employed to produce a supplementary local alarm signal to indicate the operation of an automatic operated alarm transmitter or a manual fire alarm box provided that an open or ground fault of the signal circuit conductor results only in the loss of the supplementary signal."

Even if the staff accepted the licensee's interpretation of this section of NFPA 72D-1975 that the local alarms are "supplementary" alarms, the staff would not permit those circuits to remain unsupervised since the electrical faults did not result "only in the loss of the supplementary signal." As described in the inspection report, ". . . local alarms in the Unit 1 reactor building were giving audible fire alarms simultaneously as a result of a wire to wire short." In addition, ". . . according to interviews with cognizant licensee personnel, this was a recurring event that confused and diminished employees and fire brigade member confidence in the fire alarm system to the extent that it is difficult to distinguish an actual fire alarm from a false one."

Therefore, we request that you submit an additional response to this example of violation which provides the actions you have taken or plan to take to provide the required electrical supervision.

In regards to the second example of violation concerning the lack of electrical supervision on the visual alarm annunciator panels, we accept the alarm circuits as installed from the AEER to the control room without electrical supervision. We find the lack of electrical supervision of these alarm circuits from the cabinets in the AEER to the control room acceptable primarily on the basis of the once-per-shift surveillance of the unsupervised circuits. This surveillance, in conjunction with the use of high quality cable and general absence of modifications or maintenance activities involving the circuits, renders the lack of supervision a minor deviation from the requirements of NFPA 72D-1975. We consider the level of protection provided by this arrangement to be essentially equivalent to the level that would be provided if all of these alarm circuits were electrically supervised. Therefore, this example of violation is withdrawn. Should future surveillances discover problems with these circuits, the issue should be re-evaluated to assess the continued acceptability of this installation.

Should you have any further questions regarding this matter, we will be glad to discuss them with you.

Sincerely,

ORIGINAL SIGNED BY ROBERT J. MILLER

Hubert J. Miller, Director  
Division of Reactor Safety

See Attached Distribution <sup>yes</sup>

RIII <i>RWS/jk</i> Ulje/jk 01/29/90	RIII <i>RJG</i> Gardner 01/29/90	RIII <i>[Signature]</i> Hinds 01/29/90	RIII <i>[Signature]</i> Cooper 01/30/90	RIII <i>[Signature]</i> Grobe 01/30/90	RIII <i>[Signature]</i> Martin 01/29/90	RIII <i>[Signature]</i> Miller 01/29/90
--	---	---	--	---	--	--

FEB 14 1990

Distribution

cc: T. Kovach, Nuclear  
Licensing Manager  
G. J. Diederich, Station  
Manager  
DCD/DCB (RIDS)  
Licensing Fee Management Branch  
Resident Inspector, RIII  
Richard Hubbard  
J. W. McCaffrey, Chief, Public  
Utilities Division  
David Rosenblatt, Governor's  
Office of Consumer Services