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May 4, 1983

Mr. James G. Keppler, Regional Administrator
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: LaSalle County Station Unit 2
Response to Inspection Report No.
50-374/83-05
NRC Docket Nos. 50-374

Reference (a): R. L. Spessard letter to Cordell
Reed dated April 5, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. D. Lanksbury and S. G. DuPont on February 8 through March 4, 1983, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure. Also enclosed is a discussion of the incorporation of Unit 1 lessons learned in response to the item of concern stated in Reference (a).

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

MAY 5 1983

ATTACHMENT

Response to Inspection Report No.

50-374/83-05

Item of Noncompliance

1. 10 CFR 50, Appendix B, Criterion XI, states in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written procedures..."

   10 CFR 50, Appendix B, Criterion VI, states in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy..."

   Contrary to the above, personnel involved with writing, reviewing and approving Revision 2 to PT-LP-201 failed to ensure that the requirement for testing of the systems excess flow check valve had been incorporated into another preoperational test, or that a tracking method for this requirement had been implemented, prior to deleting the testing requirement PT-LP-201.

Response

Corrective Action Taken and Results Taken

A requirement for testing of the LPCS system's excess flow check valve has been incorporated into PT-NB-201, Nuclear Boiler Preoperational Test.

Corrective Action Taken to Avoid Further Noncompliance

Lessons learned during Unit 1 preoperational testing indicated that the most effective method for testing excess flow check valves was to incorporate them all into one test procedure (PT-NB-201) and perform the test in conjunction with the vessel hydrostatic test.

This problem occurred after the test of the LPCS excess flow check valve was deleted from PT-LP-201 and before it was incorporated into PT-NB-201. Although no tracking mechanism was established for this requirement, the test engineer for PT-NB-201 was well aware that a revision to his procedure was required to complete testing of excess flow check valves. This individual was, in fact, responsible for testing of the excess flow check valves during the Unit 1 preoperational test program. Commonwealth Edison is confident that the required testing would have been accomplished in the appropriate time frame.

The test engineer for PT-LP-201 was informed of his error and was advised to ensure that required testing is incorporated into another preoperational test procedure or that the requirement is properly tracked, prior to deletion from his procedure. This noncompliance was reviewed at a meeting of the System Test Engineers shortly after it was identified.

Date of Full Compliance

Full compliance has been achieved.

Item of Noncompliance

2. 10 CFR 50, Appendix B, Criterion V, states in part, "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."

   10 CFR 50, Appendix B, Criterion XI, states in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written procedures..."

   LaSalle County Station Startup Manual procedure LSU-500-1, Paragraph D.1, states in part, "If a preoperational test procedure directs personnel to take specific actions (e.g., start a pump, turn a valve, jump a battery cell, etc.) and those actions are not taken, the failure to take those actions constitutes a procedure change which must be authorized in accordance with administrative controls for procedure changes."

   Contrary to the above, changes to specific actions required by a preoperational test procedure were implemented via two deficiency reports and therefore the change did not receive the required level of review. Subsequently the two deficiency reports were cleared without the required testing having been completed.

Response

Corrective Action Taken and Results Achieved

A requirement for testing of HPCS system's excess flow check valves has been incorporated into PT-NB-201, Nuclear Boiler Preoperational Test.

Corrective Action Taken to Avoid Further Noncompliance

The circumstances associated with this item of noncompliance, although somewhat different that those cited in the preceeding item of noncompliance, resulted in the same basic problem. The problem was that required testing was not accomplished and an adequate tracking mechanism did not exist at the time of this inspection to ensure that it was accomplished.

In this case, the system test engineer (STE) for PT-HP-20 believed that the excess flow check valves would be tested by the STE for PT-NB-201 and as a consequence signed off the applicable steps in his procedure with deficiencies. A deficiency in this instance was appropriate, since the steps constitute independent test sections, and a procedure change was neither necessary nor desirable. The deficiency, in fact, has proven to be viable tracking mechanism

to insure incomplete items are accomplished. The manner in which this was accomplished will flag this item in the exceptions section of the test evaluation and will require review and approval by Project Engineering. This increases the probability that the STE's clearance of these deficiencies in error would have been detected. It is our contention that reference LSU 500-1 in the Notice of Violation is, therefore, inappropriate.

Testing of excess flow check valves is included in the preop by reference to instrument department procedures. In writing the deficiencies, the STE referenced the procedures that the STE for PT-NB-201 intended to utilize rather than the one originally provided in PT-HP-201. This occurred because the applicable instrument department procedures were revised when it was determined that the excess flow check valves would be included in the Technical Specifications. The procedure reference in PT-HP-201 actually would not have accomplished the required testing properly. The STE's actions, although technically appropriate, resulted in an unreviewed procedure change.

An additional problem occurred when the STE cleared the applicable deficiencies without confirmation that testing of the excess flow check valves had been incorporated into PT-NB-201. In clearing the deficiencies, he destroyed the tracking mechanism he had established. As discussed previously for PT-LP-201, Commonwealth Edison is confident that the required testing would have been accomplished in the required time frame. The additional potential for detecting this problem in review of the test evaluation is available in this instance as discussed above.

This noncompliance was reviewed at a System Test Engineers' meeting and individually with the test engineer for PT-HP-201. It was stressed that items not accomplished in a given preoperational test must be incorporated into another preoperational test or a tracking mechanism established to ensure that they are properly completed. The STE's were also reminded that deficiencies must be adequately resolved prior to signing them off as completed. The issues related to the procedure change contention were also discussed to avoid the possibility of an unreviewed procedure change.

Date of Full Compliance

Full compliance has been achieved.

Item of Concern

Relative to the item of concern expressed in your cover letter, we believe that we have done an adequate job of incorporation of Unit 1 "lessons learned" into Unit 2 tests. The LaSalle Startup Manual was revised in August, 1982, to suggest that the system test engineers discuss their tests with the appropriate Unit 1 test engineer where practical. In many cases the Unit 1 system test engineer is assigned to perform the Unit 2 test or is utilized as a consultant during the performance of the test. The Unit 2 test procedures are based on the Unit 1 test procedures as revised and are reviewed by personnel familiar with the Unit 1 testing experience. During the test evaluation phase, the Technical Staff test reveiwer discusses the Unit 2 test results relative to the Unit 1 experience with the system test engineer in an attempt to identify potential problems with either unit.

Since many of the Unit 2 test procedures were written prior to completion of the Unit 1 test, one's perception of lessons learned incorporation is dependent on when the procedure is reviewed. Our philosophy has been to review and revise the test procedures just prior to performance to incorporate lessons learned, system design changes, etc.

It is admittedly more difficult to ensure that lessons learned are incorporated when the Unit 1 test experience was gained in a test that does not directly correlate to the Unit 2 test. This problem was discussed at a system test engineers' meeting and a memorandum was issued to the system test engineers to remind them of their responsibility in this area. It was specifically suggested that the test engineers not only communicate with their Unit 1 counterparts, but also with test engineers for related systems and startup tests. They were also encouraged to review the Unit 1 test evaluation for their system.

Although every effort is being made to incorporate significant lessons learned, it is not expected that all Unit 1 lessons learned will be incorporated. First of all, identification of exactly what constitutes a lesson learned is highly subjective. Secondly, the lesson learned on Unit 1 may have been created by a unique set of circumstances that is not expected to exist for Unit 2. Thirdly, most lessons learned promote efficiency and do not relate in the final analysis to test acceptability. The critical test for NRC inspection purposes should not be whether or not lessons learned are incorporated, but should be based solely on whether or not the commitments for testing were satisfied and whether or not the system performed acceptably.