



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

AUG 9 1983

Docket No. 50-373  
EA 83-59

Commonwealth Edison Company  
ATTN: Mr. James J. O'Connor  
President  
Post Office Box 767  
Chicago, IL 60690

Gentlemen:

This refers to the special safety inspection conducted at LaSalle County Nuclear Station, Unit 1, by Messrs. W. G. Guldemon and A. L. Madison of the Region III staff on June 21 through July 1, 1983. This inspection concerned the circumstances that resulted in a suppression pool to drywell vacuum breaker isolation valve being mispositioned during facility operation. Operation of LaSalle County Nuclear Station, Unit 1, is authorized by NRC Operating License No. NPF-11. The results of this inspection were discussed on June 30, 1983, during an Enforcement Conference held in the NRC Region III office between Mr. Cordell Reed and other members of your staff and Mr. J. G. Keppler, Regional Administrator, Mr. J. H. Sniezek, then Deputy Director, Office of Inspection and Enforcement, and other members of the NRC staff.

This inspection revealed that, prior to a reactor startup on May 28, 1983, the suppression pool side isolation valve for the "D" suppression pool to drywell vacuum breaker was improperly returned to service following a local leak rate test. The isolation valve was left in the closed position rendering the vacuum breaker inoperable. Deficiencies in the administrative program for equipment control and valve lineup verification and inadequate implementation of that program resulted in the improper valve position going undetected while the unit was started up on five occasions and operated in violation of the Technical Specification for a cumulative total of 21 days. These deficiencies include conflicting requirements in the out-of-service procedure and lack of double verification on return to service in the local leak rate test procedure.

We are concerned that your equipment control system, requiring independent position verification on return to service of valves important to safety, was bypassed during an in-process local leak rate test of the suppression pool to drywell vacuum breaker, and that proper return to service was not

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

AUG 9 1983

achieved prior to facility operation. A significant causative factor of these violations was the poor performance of plant personnel in that individuals designated to verify valve position failed to do so. We are also concerned that effective broad scope preventative action regarding valve position control deficiencies previously identified in NRC Inspection Reports No. 50-373/83-01(DPRP) and 50-373/83-05(DPRP) had not been implemented. Additionally, it appears that valves were periodically left in an incorrect position prior to final outage clearance in anticipation of additional maintenance and testing. Further, while we recognize that the Senior Resident Inspector was informed of this event, we are concerned that your analysis and reporting of the event was not conducted in a timely manner.

To emphasize the importance of properly controlling safety related equipment and operating the facility in accordance with the Technical Specifications, we propose to impose civil penalties for certain violations as set forth in the Notice of Violation enclosed with this letter. The violations in Section I of the enclosed Notice have been categorized in the aggregate as a Severity Level III in accordance with the General Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C. The base civil penalty for a Severity Level III problem is \$40,000. However, after considering the prior notice of similar events, the lack of effective preventative actions taken in response thereto, and the failure of multiple administrative controls which had they been properly implemented would have prevented the violation of the Technical Specifications, the base penalty for this event has been increased by 50%. After consultation with the Director of the Office of Inspection and Enforcement, I have been authorized to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalties in the amount of Sixty Thousand Dollars.

You are required to respond to the enclosed Notice of Violation and Proposed Imposition of Civil Penalties and should follow the instructions in the Notice when preparing your response. In addition to your response to the specific violations, your response to the enclosed notice should address: (1) Actions you have taken to ensure that double verification of equipment lineup is performed on return to service following all maintenance and test activities on equipment important to safety; (2) Actions you have taken to establish a feedback mechanism from personnel utilizing procedures to ensure that procedural deficiencies identified during work are resolved prior to completion of this work; and (3) Actions you have taken to ensure that short term corrective actions following future events include determination and resolution of causal factors that resulted in personnel performance deficiencies.

Your written reply to his letter and the results of future inspections will be considered in determining whether further enforcement action is warranted.

In accordance with 10 CFR 2.790, "Rules of Practice," a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

AUG 9 1983

The response directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original signed by  
James G. Keppler

James G. Keppler  
Regional Administrator

Enclosure: Notice of Violation  
and Proposed Imposition of  
Civil Penalties

cc w/encl:

D. L. Farrar, Director  
of Nuclear Licensing  
D. L. Shamblin, Site  
Construction Superintendent  
T. E. Quaka, Quality  
Assurance Superintendent  
G. J. Diederich, Station  
Superintendent  
R. H. Holyoak, Project Manager  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
Phyllis Dunton, Attorney  
General's Office, Environmental  
Control Division

ES:JC  
JCrbg  
8/3/83

ELDB:JL  
JLieberman  
8/3/83

D:ES:J  
Jaxetrad  
8/3/83

D:J  
RCDeYoung  
8/4/83

RIII  
Share/sv  
08/04/83

RIII  
WHS  
8/4/83

RIII  
WHS  
Schultz  
8-5-83

RIII  
Davis  
8/5

RIII  
Keppler  
8/7/83

AUG 9 1983

Distribution

PDR

NSIC

LPDR

ACRS

SECY

CA

RCDeYoung, IE

JA Axelrad, IE

JCraig, IE

JLieberman, ELD

VStello, DED/ROGR

FIngram, PA

JGKepler, RIII

Enforcement Coordinators

RI, RII, RIII, RIV, RV

JCummings, OIA

BHayes, OI

HRDenton, NRR

MWilliams, NRR

ABournia, NRR

JCrooks, AEOD

ELJordan, IE

JMTaylor, IE

Resident Inspector, LaSalle

IE:EA File

IE:ES File

EDO Rdg File

DCS

Karen Borgstadt

Office of Assistant Attorney General

500 S. Second Street

Springfield, IL 62701