



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

February 3, 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 Units 1 and 2  
Response to Inspection Report Nos.  
50-373/82-50 and 50-374/82-17  
NRC Docket Nos. 50-373 and 50-374

Reference (a): C. E. Norelius letter to Cordell Reed  
dated January 6, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. D. Lanksbury, P. R. Wohld, and D. L. Robinson on October 4-28, 1982, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in non-compliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

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

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PDR ADOCK 05000373  
PDR

CWS/lm

Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT A

Response to Inspection Report

50-373/82-50 and 50-374/82-17

Item of Noncompliance

1. Technical Specification 6.2, Plant Operating Procedures and Programs, states, "Detailed written procedures including applicable checkoff lists covering items listed below shall be prepared, approved and adhered to:" specifically including, "Actions to be taken to correct specific and foreseen potential malfunctions of systems or components malfunctions of systems or components including responses to alarms...."

Contrary to the above, procedures LOA 1(2)PM06J A209.R3, and LOA 1(2)PM06J B102.R1, written to provide the appropriate response to "door open" alarms for the Reactor Building watertight doors at elevation 673'4", failed to adequately specify the actions to be taken for a door alarm. The actions specified did not indicate or reflect the importance of the doors in assuring the operability of safe shutdown equipment at this elevation in the event of plant flooding due to internal water sources. This contributed to the lack of appropriate corrective action to alarm conditions during the period evaluated (September 8, 1982 to October 5, 1982). During this period, the alarm printout records indicated that one or more watertight doors in Unit 1 were not closed for over fifty percent of this time.

No response required

Item of Noncompliance

2. 10 CFR 50, Appendix B, Criterion XI states, "Test procedures shall include provisions for assuring that all prerequisites for the given test have been met, that adequate test instrumentation is available and used, ...."

LaSalle County Station Startup Manual, LSU 100-2, Revision 12, dated February 23, 1982, "Construction - Operating Turnovers and Releases," requires that, "After the release boundaries are agreed upon, Project Construction and Site Q.A. shall make a detailed verification of all items in the System and Equipment List for completeness, conformance to specification, and receipt of required documentation. Deficiency Reports shall be prepared for all deficient conditions in accordance with LSU 200-1, Pre-Turnover Deficiencies."

Contrary to the above, the Unit 2 High Pressure Core Spray (HPCS) system was transferred for testing without the HPCS flow measuring orifice installed and without this being identified by Project Construction or Site Q.A. as a deficient condition. The deficiency was only recognized when the associated flow instrument channel failed to respond when called on to take HPCS flow test data during a preoperational test.

Corrective Action Taken and Results Achieved

Deficiency report PT-HP-201-47 was initiated October 4, 1982 to record the missing flow orifice and ensure that it is eventually installed upon delivery. The circumstances which led to the Field Engineer signing the orifice installation complete were immediately reviewed with the individual. The individual fully understood how his actions led to signing off a non-installed component.

Corrective Action Taken to Prevent Recurrence

Letter DSL #164 - Subject: Adherence to Procedures was sent to all Project Construction Department personnel as a measure to learn from the instances where procedures had not been strictly followed and to preclude future instances of procedure non-adherence. Additionally, the above subject letter was reviewed during a Project Construction Department staff meeting on January 6, 1983.

Date of Full Compliance

Full compliance has been achieved as of January 6, 1983.