



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 2, 1993

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-373/93013; 50-374/93013
NRC Docket Numbers ~~50-254~~ and ~~50-265~~

Reference: B. Clayton letter to L.O. DelGeorge dated June 3,
1993 transmitting NRC Inspection Report
50-373/93013; 50-374/93013

Enclosed is Commonwealth Edison Company's response to Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The violation concerns the mispositioning of a fuel bundle in the spent fuel pool.

If there are any questions or comments concerning this letter, please refer them to Sara Reece-Koenig, Regulatory Performance Administrator at (708) 663-7250.

Respectfully,

D.L. Farrar
Nuclear Regulatory Services Manager

cc: J. B. Martin, Regional Administrator, RIII
R. Stransky, Project Manager, NRR
D. Hills, Senior Resident Inspector, LaSalle

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**ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
373(374)/93013**

VIOLATION: 373(374)/93013-02

During an NRC inspection conducted on April 27 through May 31, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1993), the violation is listed below:

LaSalle Technical Specification 6.2.A.a requires written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established, implemented, and maintained. Regulatory Guide 1.33 includes procedures for preparation for refueling and refueling equipment operation.

LaSalle Fuel Procedure (LFP)-100-2, "Administrative Control of Transfer of Fuel or Special Nuclear Material Between or Within the Spent Fuel Pool(s) or Vaults", requires in part that the transfer of fuel bundles be verified as correct with regard to the designated bundle being moved in accordance with the nuclear component transfer list.

Contrary to the above, on May 11, 1993, a fuel handler moved the incorrect bundle and the supervisor overseeing the fuel transfer mistakenly verified that the designated fuel bundle on the nuclear component transfer list was being moved.

This is a Severity Level V violation (Supplement I).

REASON FOR THE VIOLATION

Commonwealth Edison recognizes that this is a violation. An investigation into the event revealed that the fuel handling personnel relied on the normal wall coordinates in the Unit 2 spent fuel pool which were created to assist in proper fuel location identification. The fuel was being moved in an area of the pool where the markings did not provide accurate alignment of the refueling bridge for the fuel bundle being moved. The root cause for this event is that the arrangement of the fuel storage cells in the east-west direction do not line up perfectly and that relying on the normal wall identification markings is not adequate. Previous fuel movements in this area had been performed successfully, however, all the movements were done in a sequence that masked the slight misalignment of the rows (the cells were loaded in a south to north direction).

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The investigation also determined that all methods available for verifying the proper fuel bundle was moved, were followed. The error was identified when the supervisor updated the wall mounted fuel pool display board which is part of the routine verification process.

Fuel bundle mis-positioning events from the previous three refuel outages were reviewed. This event is considered an isolated case since it is directly related to the fuel pool rack installation. Actions by the personnel were in compliance with procedures and good work practices.

CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED:

- 1) Supervision was notified upon finding the error. Since the fuel was being moved per a sampling procedure and this bundle was acceptable, the transfer list was corrected to the existing conditions and the procedure completed.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

- 1) All fuel handlers were tailgated on the event and proper verification techniques.
- 2) Fuel movement in the areas where the misalignment exists (east side of the pool) will not be permitted until appropriate markings can be installed that will prevent a recurrence. The restriction will be administratively controlled in the appropriate LaSalle procedures, LFP-100-1, -100-2, and -400-1. These procedures have been revised. This problem is confined to the east area of the Unit 2 spent fuel pool.
- 3) Unit 1 has just completed the high density re-rack modification and will be index verified prior to fuel movements into this pool. The restriction will be administratively controlled in the appropriate LaSalle procedures, LFP-100-1, -100-2, and -400-1. These procedures have been revised.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved with the correction of the fuel transfer list.