



Commonwealth Edison

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May 13, 1982

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 1
Response to NRC Inspection
Report No. 50-373/82-11
NRC Docket No. 50-373

Reference (a): C. E. Norelius letter to Cordell
Reed dated April 13, 1982.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. C. C. Williams, H. M. Wescott, J. H. Neisler, and other staff members on February 9-12, 16-19, 23, 24 and March 5, 1982 of activities at LaSalle County Station Unit 1. 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 enclosure are true and correct. In some respects, these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison and contractor 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,

L. O. DelGeorge

L. O. DelGeorge

Director of Nuclear Licensing

lm
Enclosure

cc: NRC Resident Inspector - LSCS

SUBSCRIBED and SWORN to
before me this 13th day
of May, 1982

Rosalia A. Prieta
Notary Public

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ENCLOSURE

Apparent Item of Noncompliance (50-373/82-11-01)

1. 10 CFR 50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented.... procedures.... of a type appropriate to the circumstances...."

Commonwealth Edison Company Topical Report No. CE-1-A, Revision 15, Section 5 states, in part, "The quality assurance actions carried out for....construction, testing....activities will be described in documented....procedures.... These documents will assist personnel in assuring that important activities have been performed."

Contrary to the above, appropriate procedures had not been developed to prescribe Motor Control Center (MCC) breaker setting activities. As a result, of the two safety related MCC's inspected, nine breaker settings were observed which did not conform to MCC breaker setting requirements.

Response

Corrective Action:

The CECO LaSalle OAD has generated site specific breaker setting guidelines for Klockner-Moeller and GE 480V. Motor Control Centers (MCC). These site specific guidelines were added to the LaSalle OAD Electrical Construction Test Procedures (ECTP) Manuals in the following sections:

- ECTP #1 - Motors
- ECTP #7 - Misc 480V Contactors/Breakers
- ECTP #8 - Non-Motor Devices

The appropriate procedure data forms (#1A, 7A & 8A) were also revised to record consistent data and to be more explicit as to what exact values on the S&L MCC Settings Sheet (ESO-199) the breakers are being set. The guidelines state specifically that if a breaker cannot be set at the value indicated on the S&L MCC Setting Sheet, then the OAD Engineer shall submit a MCC Change Request form via CECO FCR procedure QCP 3-2. CECO OAD, in conjunction with CECO Q.A. (Q.A. Surveillance Report No. 82-210) reinspected all safety related MCC's to assure that the field settings are in accordance with the MCC Setting Sheet and MCC Change Requests, as appropriate.

Action Taken to Prevent Recurrence:

The revised OAD ECTP's and data forms will be used to set all future K/M or GE 480V breakers during the construction phase of LSCS. The LSCS Maintenance Department has also issued breaker setting guidelines, which are consistent with the OAD guidelines, to be used to set breakers that are under their responsibility.

Date of Full Compliance:

Full compliance has been achieved.

Apparent Item of Noncompliance (50-373/82-11-03a, b & c)

2. 10 CFR 50, Appendix B, Criterion XVI states, in part, "Measures shall be established to assure that conditions adverse to quality, such as....deficiencies, deviations....and nonconformances are promptly identified and corrected."

Commonwealth Edison Company Topical Report CE-1-A, Revision 15, Section 16 states, in part, "A corrective action system will be used to assure that such items as....deficiencies, deviations... and nonconformances which are adverse to quality and might affect the safe operation of a nuclear generating station are promptly identified and corrected."

Contrary to the above, the following instances of failure to promptly identify and correct deficiencies, deviations or nonconformances were identified:

- a. Measures were not established to assure that the use of unapproved MCC breaker settings was promptly identified and corrected. This is exemplified by the continued use of approved MCC breaker settings pertaining to MCC 143-1. No nonconformance report had been initiated to identify and control this nonconforming condition and the licensee had not submitted data pertaining to these settings to Sargent and Lundy for approval.
- b. Measures were not established to assure that deviations from MCC nameplate data requirements were promptly identified and corrected. This is exemplified by the three incorrect nameplates installed on MCC 135X-1 and the one incorrect nameplate installed on MCC 143-1.
- c. Measures were not established to assure that deviations from DC Distribution Panel breaker requirements were promptly identified and corrected. This is exemplified by the 60 amp breaker installed in lieu of the required 15 amp breaker in position 20 on DC Distribution Panel 112Y.

Response

Corrective Action:

- a) CECO issued NCR #585 which stated that a MCC Setting Sheet (ESO-199) has not been issued for the HPCS MCC 143-1 even though the breakers have been put in-service by CECO OAD. Engineering issued a MCC Setting Sheet (ESO-199) for the HPCS MCC 143-1 on 4/16/82 and NCR #585 has been closed.

- b) The MCC compartment nameplates were verified to be in conformance with the MCC Setting Sheets during the reinspection performed by CECO OAD and CECO Q.A. indicated in Item 50-373/82-11-01 above. New nameplates were installed as required.
- c) A 15 amp breaker has been installed in position 20 of DC Distribution Panel 112Y.

Action Taken to Prevent Recurrence:

- a) The breaker setting guidelines which have been incorporated into the LaSalle site ECTP's specifically state that the breakers are to be set in accordance with the applicable MCC Setting Sheet and the installed values are to be recorded on the appropriate data form. A MCC Setting Sheet for the Unit 2 HPCS MCC (243-1) is being used.
- b) Paragraph 3 of the breaker setting guidelines specifically states that the OAD Engineer shall verify that the MCC compartment door nameplate is in accordance with the MCC Setting Sheet.
- c) All of the safety-related DC Distribution Panels (111X, 112X, 111Y, 112Y) were inspected during this NRC Inspection. The only breaker found to be the incorrect size was #20 on panel 112Y. The change to the breaker size was inadvertently missed when the breaker was put into service (Rev. N to IE-1-4442AA dated 2/22/80). There is no indication that this was not a unique occurrence. On 10/03/80, HPF issued WI103, HPFCo Responsibilities for performing Wiring Revisions, to better control Wiring Diagram revisions. WI 103 requires that wiring diagram revisions are logged in when received and the log entry signed off when the revision is incorporated.

Date of Full Compliance:

Full Compliance has been achieved.

Apparent Item of Noncompliance (50-373/82-11-06)

3. 10 CFR 50, Appendix B, Criterion X states, in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

Commonweath Edison Company Topical Report No. CE-1-A, Revision 15, Section 10 states, in part, "Quality assurance inspectionwill be conducted....during construction....to verify conformance to applicable drawings, instructions, and procedures as necessary to verify quality."

Contrary to the above, the Q.C. inspections of instrument sensing line on February 17 and October 7, 1981, failed to verify conformance to the "Fabrication Requirement" on Morrison isometric drawings which states, in part, "Slope shall be 1/2" per foot (min)...." and Amendment 4 to Sargent and Lundy Specification J-2530 which states, in part, "Under no circumstances should a slope of less than 1/4" per foot of run be applied without approval from Consulting Engineers." As a result, three instances were observed in which the violation of the instrument sensing line slope requirements were not identified.

Response

Corrective Action:

The bent area in instrument line 1NB08B-3/4" near item 5 of the bill of materials on isometric drawing NB-33 has been moved so no trap exists.

Ten (10) additional instrument lines in Unit 1 were inspected and determined to meet the applicable requirements of an average slope of 1/4" per foot over the entire run with no level areas, rises, or traps. Clarification of Specification J-2530, Article 403.4, which serves as a guide to maintain continuous slpe along the entire run, is included in a Sargent and Lundy letter dated February 26, 1982.

Action Taken to Prevent Recurrence:

The fabrication requirements note on Morrison Construction Company's instrument isometric drawings not yet issued to the field in Unit II, have been changed to more clearly reflect the slope requirements.

Date of Full Compliance:

Full Compliance has been achieved as of April 1, 1982.