



Commonwealth Edison
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October 28, 1981

Mr. James G. Keppler, Director
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 NRC Inspection Report
No. 50-373/81-30
NRC Docket No. 50-373

Reference (a): R. L. Spessard letter to Cordell Reed
dated October 2, 1981.

Dear Mr. Keppler:

The following is in response to the inspection conducted by Messrs. R. D. Walker, S. E. Shepley, N. J. Chrissotimos, S. DuPont and P. Byron on June 29 through August 28, 1981, of activities on LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to Appendix "A" of Reference (a) is enclosed. Appendix "B" did not require a response and as a result, none is provided.

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.

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J. G. Keppler

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If you have any questions in this regard, please direct them to this office.

Very truly yours,

L. O. DelGeorge

L. O. DelGeorge
Director of Nuclear Licensing

Enclosure

cc: NRC Resident Inspector - LSCS

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SUBSCRIBED AND SWORN to
before me this 30th day
of October, 1981.

Rosalee A. Puenta
Notary Public

2758N

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION

The response to the items of apparent noncompliance identified in Appendix A of Reference (a) is provided in the following paragraphs.

ITEM 1 10 CFR 50, Appendix B, Criterion XI, requires that 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 test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The Q.A. Manual, Quality Requirement 11.0, Section 11.2 states that construction testing consists of on-site component testing such as hydrostatic testing, pressure proof testing, pump and valve testing, actuation to verify proper installation and electrical continuity verification. Written procedures or checklists will be employed and the status of equipment both before and after testing will be documented.

Contrary to the above, the inspector determined that pressure proof testing of the Secondary Containment was conducted during the weekend of July 18-19, 1981, without an approved procedure as required. The failure to have and follow procedures as required resulted in damage to the Secondary Containment roof structure.

This is a Severity Level IV violation (Supplement II).

Response:

Correction Action Taken and Results Achieved

A construction test procedure for the Secondary Containment Leak Rate Test will be written to meet the requirement of Q.P. 11-1. Specific measures will be included to prevent overpressurization and damage to the Reactor Building composition roofing and insulation.

Corrective Action Taken to Avoid Further Non-Compliance

All further pressure proof testing will be conducted in accordance with written procedures.

Date of Full Compliance:

The Secondary Containment Leak Rate Test construction procedure will be completed prior to the next test which is presently scheduled for November 7, 1981.

ITEM 2 10 CFR 50, Appendix B, Criterion XIII requires, in part, that measures be established to control the storage and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.

The Quality Assurance Program, Quality Requirement Q.R. 2.0, contains a Commonwealth Edison Company commitment to the regulatory positions of the Regulatory Guide 1.38, Revision 2, and Regulatory Guide 1.39, Revision 2. The regulatory positions of Regulatory Guides 1.38, Revision 2 and 1.39, Revision 2, endorses the requirements of ANSI N45.2.2-1972 and N45.2.3-1973 respectively. ANSI N45.2.2-1972, Section 6.2, states, in part, that ". good housekeeping practices shall be enforced at all times in the storage areas."

Section 6.5 states, in part, that, "Items released from storage and placed in their final locations within the power plant, shall be cared for in accordance with the requirements of Section 6 of this standard." ANSI N45.2.3-1973 requires in part that control of all tools, equipment, materials and supplies be maintained to prevent the inadvertant inclusions of deleterious materials or objects in critical systems. Commonwealth Edison Company, LaSalle Station, Housekeeping Procedure, Project Procedure 18-2, Part 6.3.7 states: "Equipment and systems in areas where construction activities are performed shall be properly protected."

Contrary to the above, the licensee did not adequately protect equipment as evidenced by the following items noted during plant tours:

- a. A welding power supply (energized) setting in an ESF divisional open cable tray, noted on July 13, 1981.
- b. Men welding and grinding above and in the vicinity of ESF divisional open cable trays without protection for the cables, noted on July 13, 1981, and on July 29, 1981.

This is a Severity Level VI violation (Supplement II).

Response:

Corrective Action Taken and Results Achieved

The specific items mentioned in the above non-compliance have been corrected, or in the case of certain scaffolding, determined not to be detrimental to the cable trays involved. No damage to the associated equipment, as a result of the housekeeping problems was noted.

Corrective Action Taken to Avoid Further Non-Compliance

Project Construction personnel doing housekeeping surveillance will be reinstructed in the following areas:

1. Importance of protecting cable from the effects of welding, cutting and grinding.
2. Cable tray and electrical equipment cleanliness.
3. Damage potential to cable trays.

In addition, housekeeping inspections of the above areas will be periodically documented on Housekeeping Inspection Form AB 12.1.

Date of Full Compliance

Compliance with be achieved by November 02, 1981.