U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-373/78-21

Docket No. 50-373

License No. CPPR-99

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10-10-78

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Licensee: Commonwealth Edison Company P. O. Box 767 Chicago, IL 60690

Facility Name: La Salle County Nuclear Station, Unit 1

Inspection At: La Salle Site, Seneca, IL

Inspection Conducted: September 13-15, 1978

Inspectors: W. D. Shafer W. D. Shafe? R. S. W. Long R. D. Walker

Approved By: R. C. Knop, Chief Reactor Projects Section 1

Inspection Summary

Inspection on September 13-15, 1978 (Report No. 50-373/78-21) Areas Inspected: Routine, unannounced inspection to review the status of the preoperational test program, operational staffing, QA responsibility and a plant tour. The inspection involved 46 inspector-hours onsite by two NRC inspectors. Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

*R. H. Ragusse, Senior Operating Engineer

- *R. D. Bishop, Technical Staff Supervisor
- *C. Shroeder, Rad Chem Supervisor
- *J. C. Renwick, Operating Engineer
- J. G. Marshall, Operating Engineer
- *J. H. Harris, Training Supervisor
- *J. R. Kodarick, Quality Assurance Operations
- *E. J. Stevack, Quality Assurance

*Denotes those attending the exit interview.

The inspectors also talked with and interviewed several other licensee employees.

2. Preoperational Testing and Startup Program

The following procedures were reviewed to determine that the applicants operating procedures which control safety related operations have been developed in accordance with FSAR commitments and regulatory requirements.

LOP-RT-OIE Reactor Water Cleanup System Electrical Check List

LOP-RT-01M Reactor Water Cleanup System Mechanical Check List

LOP-RT-01 Reactor Water Cleanup System Filling and Venting

LOP-RT-05 Reactor Water Cleanup System Filter/Demin Backwash

LOP-RT-02 Reactor Water Cleanup System Startup

LOP-RT-08 Reactor Water Cleanup System Strainer Backwash

LOP-SC-OlE Standby Liquid Control System Electrical Check List

LOP-SC-OlM Standby Liquid Control System Mechanical Check List

LOP-SC-Ol Filling, Venting and Draining the Standby Liquid Control System

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LOP-SC-02 Standby Operation of the Standby Liquid Control System

LOP-SC-03 Standby Liquid Control Solution Tank Draining

LOP-SC-04 Standby Liquid Control Solution Tank Filling

LOP-HP-OIE High Pressure Core Spray Electrical Check List

LOP-HP-OlM High Pressure Core Spray Mechanical Check List

LOP-HP-01 Filling and Venting of High Pressure Core Spray System

LOP-HP-03 Preparation For Standby Operation of High Pressure Core Spray System

LOP-RI-OIE Reactor Core Isolation Cooling System Electrical Check List

LOP-RI-OlM Reactor Core Isolation Cooling System Mechanical Check List

LOP-RI-05 Preparation For Standby Operation of the Reactor Core Isolation Cooling System

LOP-RI-04 Turbine Trip Recovery and Turbine Reset Reactor Core Isolation Cooling System

LOP-RI-02 Startup and Operation of the Reactor Core Isolation Cooling System

LOP-RI-03 Reactor Core Isolation Cooling System Shutdown

LOP-LP-OIE Low Pressure Core Spray System Electrical Check List

LOP-LP-OlM Low Pressure Core Spray System Mechanical Check List

LOP-LP-02 Preparation for Standby Operation of the Low Pressure Core Spray System

LOP-LP-03 Shutdown of Low Pressure Core Sprzy System After Automatic Initiation

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LOP-WR-OlE Reactor Building Closed Cooling Water System Electrical Checklist

LOP-WR-OlM Reactor Building Closed Cooling Water System Mechanical Checklist

LOP-WR-02 Startup and Operation of the Reactor Building Closed Cooling Water System

LOP-WR-03 Charging the Reactor Building Closed Cooling Water System Chemical Feeder

LOP-WR-04 Reactor Building Closed Cooling Water System Supply to Drywell Coolers

The areas of concern identified by the inspector were that numerous procedures required are not yet available for review by the inspector and that many of the procedures reviewed by the inspector were incomplete or in error. The licensee responded that these problems would be worked out and the procedures would be ready for review at the completion of preoperational testing. The inspector cautioned that he must have sufficient time for procedure review prior to license approval. The licensee's procedures in this area will be reviewed in a future inspection. No items of noncompliance or deviations were identified.

3. Operational Staffing Review

The following areas of operational staffing were reviewed to verify if all staff positions are filled and the adequacy of the staff qualifications for their designated positions:

- a. The licensee's commitment to ANSI N18.1.
- b. The operating organizational structure is in accordance with the FSAR, all staff positions are filled or will be filled by license issue, and the following personnel satisfy the minimum qualification requirements: Station Superintendent, Assistant Superintendent, Senior Operating Engineer, Maintenance Engineer, Technical Staff Supervisor, Shift Engineer, Shift Foreman, Master Electrician, Master Mechanic, Lead Nuclear Engineer, Master Instrument Mechanic, Rad/Chem Supervisors, Nuclear Station Operators, Equipment Operators, Control System Technicians, Senior Mechanic Nuclear, Senior Electrician Nuclear, and Training Supervisor.

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- c. The Technical Support Section is in accord with the FSAR.
- d. The plant welding and NDE personnel are qualified in accordance with code requirements described in the FSAR.
- Responsibility has been assigned to assure minimum educational, experience, and qualification requirements will be satisfied for personnel in the job positions identified above.

One area of concern identified by the inspector was an inadequacy in the licensee's administrative procedure for assuring compliance with ANSI 18.1. The inadequacy in the procedure was failure to identify which file within the plant central files is to contain the ANSI 18.1 qualification statement required by the procedure. The licensee assured the inspector that a change to the procedure to correct the inadequacy would be made and implemented. This concern will be reviewed in a future inspection. No items of noncompliance or deviations were identified.

4. Review of Plant Procedures

In a previous inspection (IR 50-373/78-13), the inspector identified and left open several concerns relating to the licensee's administrative procedures. As a part of a continuing review process, the concerns identified in the above identified inspection report are considered closed with the following exceptions:

- a. While reviewing La Salle Administrative Procedure 820-1, Station Procedures, the inspector noted that the licensee does not address the periodic review of procedures as required by ANSI 18.7, 1976. This concern remains an open item.
- b. While reviewing the La Salle Administrative Procedures the inspector noted that no provisions exist to conduct a 50.59 review as required by the Code of Federal Regulations (10 CFR 50). This concern is an open item.
- c. One additional concern left open from the previous inspection related to a housekeeping program. During this inspection the inspector reviewed LAP 900-15, Housekeeping, and determined that the licensee's program as described therein appears adequate for auditing of

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conditions within the plant on a periodic basis. However, the procedures does not establish or identify responsibility for assuring plant cleanliness on a day-to-day basis. The statement in the procedure identifying housekeeping as everyone's responsibility is not adequate. The inspector informed the licensee that a clear line of responsibility must be identified. This is an open item.

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With the exceptions as identified above, the inspector verified that administrative controls have been established for the review, approval, and periodic updating of the following categories of procedures:

- a. Administrative
- b. General Plant Operation
- c. Startup, Operation and Shutdown of Safety-Related Systems
- d. Correcting Abnormal, Offnormal or Alarm Condition's
- e. Combating Emergencies and other Significant Events
- f. Control of Regular Activity
- g. Control of Measuring and Test Equipment
- h. Maintenance
- i. Chemical and Radiochemical Activities
- j. Security
- k. Refueling
- 1. Emergency Plans
- m. Technical Support
- n. Control of Standing Orders and/or Special Orders

As a part of the review, the inspector selected approximately 20 recently issued plant procedures and verified that review, approval, and updating have been made in accordance with administrative controls; issuance of new procedures and control of superseded procedures have been in accordance with the licensee's program; and working copies of procedures within the plant agree with the current approved revision in the master file. Review also included discussions with licensee representatives to determine their knowledge regarding the control of temporary changes to procedures.

During the review of the licensee's standing orders, the inspector noted that standing orders are issued as La Salle Administrative Procedures (Section 1600) and have the same review requirements as any other administrative procedures. The inspector also noted that station orders as identified in LAP 1200-3 appear to have adequate administrative controls with regards to appropriate reviews and approvals. The licensee at present does not have any station orders, and does not intend to use station orders for now.

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No items of noncompliance or deviations were identified.

5. Preoperational Testing, Quality Assurance

The inspector reviewed the licensee's quality assurance program with respect to preoperational testing. The review included a determination that the licensee's QA program provides controls over the conduct of preoperational testing and related activities, that the licensee is complying with the commitments made in the final safety analysis report and regulatory requirements, and that the licensee's QA program covering these areas has been implemented. During the inspection, the inspector determined that formal requirements relating to authorities and responsibilities of individuals or groups have been assigned and that a clear understanding of basic responsibility is clearly understoof by key personnel. No significant concerns were identified.

The inspector reviewed the licensee's program for training and qualification of QA personnel and determined by review of personnel records that key personnel within the department meet the minimum education, experience and qualification requirements established for the assigned positions. No significant concerns were identified.

The inspector attempted to review the licensee's implementation of the quality assurance program in the area of preoperational testing, however, preoperational testing of safety-related systems has not yet started. The implementation of the licensee's QA program will be reviewed in a future inspection.

No items of noncompliance or deviations were identified.

6. Plant Tour

The inspectors conducted a tour of the plant facilities for familiarization purposes and to determine the adequacy of the licensee's housekeeping program during construction. The inspectors noted that the plant cleanliness in some portions of the plant appeared adequate. However, as the inspectors progressed down into the reactor building housekeeping conditions were not adequate. The inspectors noted the accumulation of garbage and debris in the cable trays and walkways throughout the reactor building. In the reactor building basement, the inspectors noted areas with water on the floor and accumulation of trash far beyond what is normally expected during the construction of the facility. This was discussed at the exit interview.

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7. Exit Interview

The inspector met with licensee representatives denoted in paragraph 1 at the conclusion of the inspection on September 15, 1978. The inspector summarized the scope and findings of the inspection. The inspector discussed with licensee representatives the conditions of the plant during the plant tour as identified in paragraph 6. Also discussed at this time was the plant personnel responsibilities of plant conditions upon receipt of systems and/or areas from the construction department. The inspector informed the licensee that while an adequate audit program exists for plant housekeeping conditions, specific responsibilities for day-to-day maintenance must be assigned in writing. Dr. M. J. Oestmann and Mr. R. C. Knop of the Region III office were onsite at this time and did attend the meeting.