



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

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November 26, 1990

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2
Response to I.R. 373/90024 and 374/90025
NRC Docket Nos. 50-373 and 50-374

Reference: (a) L.R. Greger letter to C. Reed dated
October 23, 1990.

Dear Mr. Davis:

This letter is in response to the NRC safety inspection conducted by Messrs. R.A. Paul and A.G. Januska of your staff on September 24-28, 1990; at LaSalle County Station.

Reference (a) identified concerns with the licensee's Radiation Protection Program. These concerns regarded problems with pre-job review and communications on the part of various station groups that continue to be identified in the stations Radiological Occurrence Reporting System. Their persistence as described in Reference (a) might suggest the possible existence of a more pervasive weakness such as training which is not being effectively addressed by the Licensee's corrective actions for the individual events.

The Commonwealth Edison Company response to the identified concern is provided in the following attachment.

If you have any questions regarding this matter, please contact this office.

Very truly yours,

Wayne E. Morgan

W.E. Morgan
Nuclear Licensing Administrator

WM:lmw
ZNLD607/12

cc: Senior Resident Inspector, LSCS

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ATTACHMENT

LaSalle County Station's response to NRC Inspection Report 50-373/90024-02; 50-374/90025-02 concerns regarding problems with Pre-Job Review, Planning and Communications which continue to be identified in the Radiation Occurrence Report (ROR) System.

LaSalle County Station has performed a review of ROR's written during 1989 and 1990. The intent of this review was to summarize the event, list the root cause(s), describe the corrective actions for each ROR and look for trends among the causes to determine if these ROR's are the result of a larger problem at the station. The Station agrees with the inspection report in that pre-job communications and planning, along with on-going communications during the job, have shown up as either the primary or contributing causes of many of the ROR's.

LaSalle County Station realizes that the review of root cause(s) to identify trends generic to the Station is the next logical step in the improvement of the ROR Program used at LaSalle Station. The Station will create a standard set of cause codes for ROR tracking and trending. These codes will be entered into the existing ROR computer tracking program, following a programming change, for trending the possible causes of each ROR identified. The program change is expected to be in place by January 31, 1991, and will have the ability to report such trends to the Station Manager via LRP-1150-2, ROR Trending and Reporting, on a quarterly basis, beginning with the first quarter of 1991.

Increased emphasis will be placed on improving communications while in the planning and execution phase of work activities. This will be accomplished by the following:

1. Radiological Protection (RP) Department representatives will conduct communications sessions with the various work groups at the station. These sessions will be conducted on a regular basis for each work group. The frequency of these sessions will be based on the amount of time each work group spends performing work in a radiation area. These sessions will commence in December 1990.
2. An RP representative from the ALARA group has been appointed to attend daily unit planning sessions to identify potential areas that may require increased radiological controls. This individual will also attend job specific outage planning sessions to accomplish the same goal.
3. The RP Department will exchange work supervisors with the Mechanical Maintenance Department to enhance interdepartmental communications for the purpose of improving radiological control adherence.
4. The Radiation Work Permit (RWP) program has been revised. This revision includes "Task Listing" to improve radiological controls of specific steps within the overall job.