



Commonwealth Edison
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Downers Grove, Illinois 60515

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January 14, 1991

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road-R111
Glen Ellyn, IL 60137

Subject: LaSalle Station Units 1 and 2
Response to the SALP 9 Board Report
NRC Docket Nos. 50-373 and 50-374

Reference: A. Bert Davis letter to Cordeli Reed dated
November 30, 1990, transmitting the
LaSalle County Station SALP 9 Board Report

Dear Mr. Davis:

The referenced letter transmitted the SALP 9 Board Report for LaSalle County Station which summarized the station's performance for the period of July 1, 1989 through September 30, 1990. In addition, we had the opportunity to discuss this report with you and members of the NRC staff during the meeting held at the Mazon Emergency Operators Facility on December 20, 1990. The purpose of this letter is to formally provide our comments on the SALP 9 Report.

We are pleased to receive the Category 1 rating in the area of Plant Operations. We believe this rating reflects the strength, professionalism and hard work of the station as a whole. In the areas of Maintenance/Surveillance, Safety Assessment/Quality Verification, Radiation Protection, Engineering/Technical Support and Security we note that the SALP report reflects the overall continuation of the improving trend at LaSalle Station. We will continue to focus our attention on the efforts which have led to this positive trend. Such attention will ensure further enhancement of all aspects of LaSalle Station's performance.

The Board Report did note a number of events caused by procedural problems/equipment problems. We agree that procedural quality and procedural adherence are areas requiring continued management focus. Significant station resources have been and will continue to be directed toward procedure upgrades. While there have been a number of events due to equipment failures, we do not believe that these events are indicative of a problem with the maintenance program. Additional investigations and evaluations of equipment problems have been initiated to minimize repetitive failures. As a part of that effort, SALP 9 LER data was reviewed and repetitive equipment failures were not identified as a significant cause of LER's. However, we will continue to look for trends and eliminate any repetitive failures as appropriate.

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The report identifies three long standing issues as just recently being addressed in the Engineering/Technical Support area. For your information, our review indicates that two of these issues were addressed and resolved prior to the beginning of the SALP 9 period:

- 1) A larger motor operator was installed to facilitate opening of the residual heat removal system shutdown cooling suction valve. These modifications were completed in September, 1987 and February, 1989 respectively for Units 1 and 2.
- 2) A motor operator was added to a manual valve previously in series to the feedwater control valve to correct the oversized valve issue. In addition, a smaller bypass valve was installed around the normal feedwater and control valve. This work was completed in July, 1988 and in February, 1989 respectively for Units 1 and 2.

The third identified issue is the final resolution of the degraded HPCS buried piping. An Engineering solution to the problem has been determined and a Technical Specification change submitted. Upon approval of the Technical Specification change, the permanent modifications will be installed during future refueling outages (presently scheduled for early 1992 for Unit 2 and late 1992 for Unit 1). As interim measures, Station procedures and critical control room drawings have been revised to reflect the current configuration. The operator training program has been revised to reflect this configuration.

As noted in the Report, the Station's Technical Staff has been significantly strengthened by the addition of 25 new hires in 1990. Fourteen of these individuals have military or industry experience (eight of who were previously assigned at LaSalle through other employers). All new hires participate in standard, non-licensed systems training and fundamentals training. In preparing these individuals so that they can be effective Technical Staff Engineers, system specific training is provided by the NSSS lead system engineers. In addition, experience is gained by on-the-job training, where individuals work with the group leaders. There are currently eight group leaders, with a combined average experience level of 9.4 years. Although we agree that the average experience level of our Technical Staff Engineers at this time may be less than desirable due to our new hires, we are making substantial efforts to increase their knowledge level by providing appropriate classroom and on-the-job training. Additionally, the experience level of our supervisory personnel is substantial,

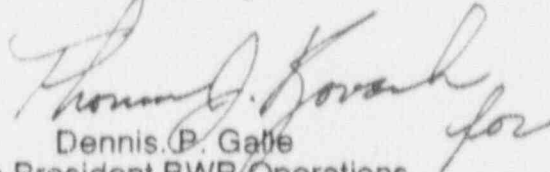
The Emergency Preparedness SALP rating does not appear to us to best reflect either the description of LaSalle's performance during this SALP period or the similarity with LaSalle's SALP 1 performance during the SALP 8 period. We request that you review the overall rating assigned by the SALP Board in the functional area of Emergency Preparedness. This request is made with the full understanding that the assignment of a SALP rating involves judgment based on a knowledgeable balancing of experience and safety significance by senior NRC management and staff. Attachment A provides information relevant to our request.

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Finally, Commonwealth Edison Company appreciates the efforts of the NRC in preparing the SALP report. We view the Category 1 rating in Operations, and the 2 Improving Rating in SA/QV and Maintenance/Surveillance as important confirmation that our efforts and resources are being effectively directed and recognized. Your positive comments at the SALP meeting, regarding the improving trends and initiatives in the areas of Engineering/Technical Support, Radiation Protection, and Security is consistent with our belief that LaSalle County Station is achieving performance enhancements that are worthy of recognition. We find the SALP process valuable in assisting us in assessing our overall performance.

Should your staff have any comments regarding this response, please direct them to the Nuclear Licensing Department.

Respectfully,


Dennis P. Galle
Vice President BWR Operations

Attachment

cc: R. Pulsifer-Project Manager, NRR
J. Hickman-Project Manager, NRR
T. Tongue-Senior Resident Inspector, LaSalle Station
W. Snell-RIII
NRC Document Control Desk

ATTACHMENT A

During this SALP 9 period, there were three emergency preparedness inspections which indicated a high level of performance at LaSalle. Three inspections are atypical but resulted from the fact that two emergency plan exercises occurred during this SALP period compared to one exercise which is typical. Although one weakness was identified in each of these two exercises, the SALP report and individual exercise inspections noted that Edison initiated timely and comprehensive solutions to correct these unrelated weaknesses and to address their root causes. We view our responsiveness as determinative of our performance because we believe that weaknesses will continue to be revealed as we develop ever more challenging exercise scenarios consistent with our commitment to excellence.

We acknowledge that in the 1990 exercise an Unusual Event classification was not declared when a postulated fire in the plant was not extinguished within ten minutes. However, this particular exercise scenario was unusually complicated, posing the shift engineer with six scenario events within the first seventy minutes of the exercise. After the shift engineer addressed plant conditions, he appropriately identified the fire and the contaminated injured person as two separate Unusual Events, and he declared an Alert. This particular exercise weakness was closed after an NRC inspector observed event classification during simulator training scenarios and reviewed procedure and training module revisions. No other indications of weaknesses have been observed with event classification. Five actual events occurred during the SALP 9 period as well as multiple events during the other exercise all of which were properly classified.

With respect to the assembly and accountability weakness identified in the 1989 exercise, we share the importance attached to successful demonstration of this capability by the NRC. It should be pointed out that an artificial constraint was placed on the assembly/accountability activity which we believe resulted in the delay of the accounting for all the assembled personnel. During the 1989 assembly demonstration, the station identified a certain number of individuals who would be "exempt" from the assembly in order to minimize stoppage of outage work during the assembly. As a direct result of the time it took to address the "exemptions", the assembly took longer than if an actual assembly had been performed. In response to the unsuccessful assembly, the station has changed its philosophy regarding "exemptions". Four other assemblies, with a comparable level of staffing, were successfully conducted during the SALP 9 period.

In regards to the weakness identified during an emergency preparedness inspection near the latter part of the SALP period, we share your concern regarding the need for enhanced training of certain personnel assigned to repair and damage control teams. Commonwealth Edison had identified, prior to the inspection that, while individuals providing leadership in the Operational Support Center (OSC) for the damage control teams were required to attend training classes specifically designed for their position, there was a need to enhance the EP training program at all of our stations by standardizing the training required for potential OSC responders who are not assigned specific GSEP positions. This training has been scheduled to begin in March, 1991, coincident with the implementation of Revision 7 to the Commonwealth Edison GSEP.

The impact of the training weakness upon the overall Emergency Preparedness SALP rating was greater than we expected. The training weakness, which was also noted by the NRC through interviews with six OSC responders, did receive prompt corrective action by Edison. Upon identification of the knowledge weaknesses of the mechanical maintenance responders, they were immediately removed from the station's callout list and replaced with personnel who were given additional instruction by the Emergency Preparedness Coordinator/Trainer about their OSC responder duties. These prompt corrective actions had not been effectively conveyed to Region III prior to the end of the SALP 9 period.

ATTACHMENT A (continued)

In addition, all the damage control responders have since received the new standardized OSC Responder training. Any other personnel being added to the callout list will receive the new standardized training prior to being placed on the list.

One of the two individuals identified by the NRC as having knowledge deficiencies was unfamiliar with the term "Operational Support Center." We believe his unfamiliarity with the term "OSC" resulted from his experience with more commonly used terminology at LaSalle of the OSC as the "B-man's Lunchroom". The individual involved is an experienced maintenance foreman at LaSalle Station and has been trained annually during N-GET training about his responsibilities during an emergency. We believe that the individual would have properly reported upon assembly and would have been available to perform his emergency response duties even though he was not familiar with the "OSC" terminology.

Although Edison has identified the training weakness as an area to direct our improvement efforts, we have not viewed the weakness as representing a violation of NRC requirements. Specialized training and periodic retraining for emergency personnel, including repair and damage control teams, is required by 10 CFR Part 50, Appendix E, IV.F. Edison's training for repair and damage control teams is described in Section 8.2 of the LaSalle Station Generating Station Emergency Plan. The specialized training on Emergency Plan basics is provided for these teams during the N-GET training. In accordance with our GSEP Manual the N-GET training instructs these responders that their duties in the OSC will closely parallel their normal work responsibilities at LaSalle Station. Though we agree that the training from the OSC responders should be enhanced, as had been identified by our own review, it did fulfill the requirements of 10 CFR 50.

While the SALP report acknowledges that our enforcement history, management involvement, response to operational events, and staffing levels in this area remained good, there are additional improvements that have been made in the Emergency Preparedness program both at LaSalle and throughout Edison during the recent SALP period. A listing of notable improvements is included as Attachment B to these remarks. We believe these improvements, many of which are long-term improvement programs, reflect our expectation of continued superior performance in the future. The management commitment to and involvement with these improvements is intended to make a strong program stronger by undertaking major initiatives such as additional training and the voluntary development of the Emergency Response Data System (ERDS) Program. We believe these attributes are associated with Category 1 SALP performance and are the hallmark of a superior emergency preparedness program.

As a result of our analysis contained in this attachment we request that you reconsider the SALP Board's Category 2 rating for Emergency Preparedness. Regardless of the outcome, we will continue to strive for superior performance in our Emergency Preparedness Program with the goal of achieving consistent SALP 1 performance at all six of our nuclear stations.

ATTACHMENT B

The following constitutes a listing of significant programmatic and station-specific improvements implemented during the recent SALP period for LaSalle Station.

1. Improved Assembly and Accountability Procedures.
2. Developed detailed relocation plans, which include the relocation of onsite personnel as well as plans to accept people relocated from other stations.
3. Initiated a table-top drill program in addition to the required drill and exercise program.
4. Emergency Response Data System (ERDS) implemented in December, 1990.
5. Acquired dedicated GSEP van for the station.
6. Replaced post-accident radioanalytical equipment (PARAPS).
7. Upgraded Field Team Training, which included training on neighboring stations' sampling points. Demonstrated the adequacy of the training by providing a field team from LaSalle Station to participate in the Braidwood Exercise.
8. Combined Operations GSEP and General GSEP training at LaSalle under one instructor.
9. Improved security-related procedures by providing an evacuation plan for the Central Access Security (CAS) facility and by upgrading shift orders when alerting people in site outbuildings during an assembly.
10. Completion of GSEP Revision 7 through on-site and off-site reviews with an anticipated implementation date of March 1, 1991.
11. Conversion of the Emergency Operations Facilities (EOF) to include the Executive Management Center concept. Morrison is complete, and Mazon is near completion.
12. Expansion of the Nuclear Services Emergency Preparedness (NSEP) corporate staff.
13. Activation of the expanded and enhanced Corporate EOF at Downer's Grove.
14. A Human Factors Upgrade of the C-Model Program. Scheduled for final implementation in the first quarter of 1991.
15. Upgrade of the Environmental Training Program. Initiated in the second quarter of 1989.