



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION III
 799 ROOSEVELT ROAD
 GLEN ELLYN, ILLINOIS 60137

*DCD/DCB
(R105)*

FEB 1 1991

Docket No. 50-373
 Docket No. 50-374

Commonwealth Edison Company
 ATTN: Mr. Cordell Reed
 Senior Vice President
 Opus West III
 1400 Opus Place
 Downers Grove, IL 60515

Gentlemen:

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP 9) Report for the LaSalle Nuclear Plant, and our meeting of December 20, 1990, which discussed in detail the contents of the report and your written comments dated January 14, 1991 relative to the report.

Based on our in-depth discussions during the meeting and our thorough review and evaluation of your letter of response, we have reached the conclusion presented in the enclosed meeting summary for the Final SALP Report to this letter. With the incorporation of the revised page from Enclosure 3, the Initial SALP Report should be considered to be the Final SALP Report.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter with the referenced enclosures, will be placed in the NRC's Public Document Room.

No reply to this letter is required; however, should you have questions regarding the Final SALP Report, please let us know and we will be pleased to discuss them with you.

Sincerely,

A Bert Davis

A. Bert Davis
 Regional Administrator

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 PDR ADOCK 05000373
 Q PDR

Enclosures:

1. Final SALP 9 Report
 No. 50-373/90001; 50-374/90001
 (Meeting Summary)
2. Revision Sheet
3. Revised Page to SALP Report
4. Licensee Response Ltr,
 dtd January 14, 1991

See Attached Distribution

120093

*JE40
1/1*

Distribution

cc w/enclosure:

D. Galle, Vice President - BWR
OperationsT. Kovach, Nuclear
Licensing ManagerG. J. Diederich, Station
Manager

DCD/DCB (RIDS)

OC/LFDCB

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Enclosure 1

SALP 9

FINAL SALP REPORT

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Inspection Report No. 373/90001; 347/90001

Commonwealth Edison Company

LaSalle County Station

July 1, 1989 through September 30, 1990

9102120220

LaSalle County Station

A. Summary of Meeting with Commonwealth Edison Company on December 20, 1991

The findings and conclusions of the SALP Board are documented in Report No. 50-373/90001; 50-347/90001 and were discussed with the licensee on December 20, 1991, at the Mazon Emergency Operations Facility.

While the meeting was primarily a discussion between the licensee and NRC, it was open to members of the public as observers.

The following licensee and NRC personnel were in attendance, as well as the noted observers.

Commonwealth Edison Company

B. Thomas, President
D. Galle, Vice President, BWR Operations
G. Diederich, Station Manager
D. Farrar, General Manager, Nuclear Services
I. Johnson, Nuclear Services, Emergency Preparedness
Q. Youna, NSEP, Governmental Affairs Administrator
L. Holden, NSEP, Onsite Program Administrator
K. Klotz, NSEP, Emergency Preparedness Coordinator
P. Barnes, Nuclear Licensing, Compliance Supervisor
R. Radtke, Nuclear Licensing, Compliance Engineer
R. Tuetkin, ENC Projects Manager
B. Saunders, Corporate Nuclear Security Administrator
R. Morley, Security Administrator
R. Barla, Assistant Security Administrator
L. Lauterbach, Onsite Nuclear Safety Administrator
T. Kovach, Nuclear Licensing Manager
W. Morgan, Nuclear Licensing Administrator
R. Querio, General Manager Quality Programs and Assessments
W. Huntington, Technical Superintendent
C. Schroeder, Production Superintendent
J. Walkington, Services Director
R. Moravec, Project Manager, LSCS ENC
J. Schmeltz, LaSalle Operations
B. Westphal, Maintenance Staff Supervisor
N. Sheldon, Assistant Superintendent of Maintenance
T. Hammerich, Regulatory Assurance Supervisor
R. Clark, Stores Services Coordinator
T. Ziakis, Industrial Relations Representative
R. Dillon, Admin Office Supervisor
G. Wilson, MIS Supervisor
D. Demos, District Superintendent
W. Betourne, Nuclear Quality Programs Superintendent

J. Steinmetz, ENC-NO Construction Superintendent
D. Hieggelke, Health Physics Services Supervisor
K. Francis, Radwaste Coordinator
T. Shaffer, Training Supervisor
J. Williams, Nuclear Engineering Department Supervisor
M. Cray, Master Instrument Mechanic
T. O'Connor, Master Mechanic

Nuclear Regulatory Commission

A. Bert Davis, Regional Administrator
H. Miller, Director, Division of Reactor Projects (DRP)
W. Shafer, Chief, Branch 1, DRP
W. Snell, Chief, Radiological Controls and Emergency Preparedness, Division
of Radiation Safety and Safeguards (DRSS)
R. Pulsifer, Project Manager, NRR
T. Tongue, Senior Resident Inspector
C. Phillips, Resident Inspector
R. Lerch, Project Engineer
M. Miller, Reactor Engineer
T. Laughton, Reactor Engineer Co-op

Illinois Department of Nuclear Safety

J. Roman, Resident Engineer
D. Lyons, Technical Analyst

B. Comments Received from Licensee

Commonwealth Edison Company's response to the LaSalle Initial SALP 9 Report dated January 14, 1991, included several comments that have resulted in a minor revision to the Initial SALP Report. This change is listed in Enclosure 2 and the revised page is included as Enclosure 3.

The affected page of the Initial SALP Report should be replaced with the corrected page included in Enclosure 3.

We have reviewed the information you provided to us regarding the emergency preparedness program. Our review of that information did not identify any significant information that was not considered by the SALP board in their deliberations. We have also reviewed the SALP report details in the Emergency Preparedness functional area and believe they are not in conflict with the SALP rating assigned by the SALP Board. We continue to believe that your performance during this SALP assessment period is properly rated as SALP Category 2. This rating is a decline from the SALP Category 1 rating during the previous assessment period and reflects our concerns over several issues during the assessment period, primarily the training omissions for repair and damage control teams, the emergency classification and assembly and accountability exercise

weaknesses, the lack of timeliness exhibited in correcting the repair and damage control training omissions, and the untimely redemonstration of the assembly and accountability weakness.

C. Regional Administrator's Conclusions Based on Consideration of Licensee Comments

I have concluded that the overall ratings in the affected areas have not changed.

REVISION SHEET

<u>PAGE</u>	<u>LINE</u>	<u>NOW READS</u>	<u>SHOULD READ</u>
15	35-40	However. . .addressed	The. . .addressed

Basis: Clarification of Data.

all concerns and questions were resolved. Further, the licensee kept the staff informed as status changed on various issues.

However, there were instances where engineering analyses relating to plant operations were inconsistent. For example, the minimum temperature assumed in the station battery sizing calculations was higher than the minimum temperature currently allowed by the Technical Specifications. Similarly, the adequacy of the Division III batteries was based on a battery capacity of 89% of the manufactured rating although the surveillance test measuring capacity had an acceptance criteria of 80%. There were three cases where procedures had not been revised to reflect recent modifications. The subsequent performance of these procedures resulted in unplanned actuations ESF equipment. For example, the May 1990 performance of the Division I response time testing procedure resulted in the inadvertent closure of the Reactor Water Clean Up (RWCU) outboard isolation valve and trip of the RWCU pump. The procedure had been revised in February 1990, but a verification or validation had not been performed at that time.

The licensee's approach to the identification and resolution of technical issues was usually prompt and effective. The failure of clamping nuts during the installation of seismically qualified battery racks was thoroughly analyzed and effective corrective action was taken. NRC SSFI concerns regarding the discrepancies between design and operation for the batteries were promptly corrected with night orders for the short term, and procedure revisions for the long term to ensure that the batteries would remain operable. Discrepant procedures were promptly revised, such as the procedure used for monitoring Division III battery room temperatures. Other than the battery sizing issues discussed earlier, the licensee's actions to resolve the concerns identified in the NRC SSFI and Probabilistic Risk Assessment (PRA) inspections were responsive and complete. However, some longstanding issues such as the degraded high pressure core spray return line to the condensate storage tank, the residual heat removal system shutdown cooling suction valve which was difficult to open, and the oversized feedwater control valve which made reactor vessel level control difficult for low flow conditions are just recently being addressed.

The staffing of the onsite engineering and technical support groups has been substantially increased by approximately 20 engineers during the assessment period. However, most of the new engineers lack the experience and training needed to effectively contribute in the near term. The system engineer staff included positions and responsibilities that were clearly defined, and required the engineers to develop a systems notebook addressing operations and trends for their systems. The licensee

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Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

Enclosure 4

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 Cordell 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.

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.

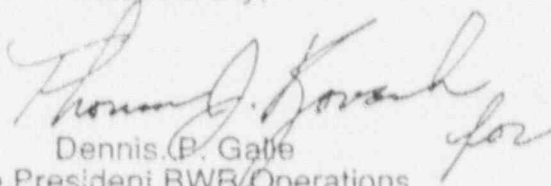
The Emergency Preparedness SALP rating does not appear to us to best reflect either the description of LaSalle's performance during this SALP period or the similarity with LaSalle's SALP 1 performance during the SALP 8 period. We request that you review the overall rating assigned by the SALP Board in 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.

January 14, 1991

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,

A handwritten signature in cursive script, appearing to read "Dennis P. Gale", with a flourish at the end.

Dennis P. Gale
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.