



Commonwealth Edison
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November 5, 1982

Mr. James G. Keppler, Regional Administrator
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 Inspection Report Nos.
50-373/82-41 and 50-374/82-09
NRC Docket Nos. 50-373 and 50-374

Reference (a): J. F. Streeter letter to Cordell Reed
dated October 7, 1982.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. W. Guldemon, S. Stacek, and G. Wright on August 2-31, 1982, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in non-compliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

L. J. DelGeorge
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT

Item of Noncompliance

As a result of the inspection conducted on August 2-31, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 55.3(a) states, "No person may perform the function of an operator defined in this part except as authorized by a license issued by the Commission."

10 CFR 55.4(d) and (f) define the function of an operator as manipulation of a control of the facility which directly affects the reactivity or power level of the reactor.

10 CFR 55.9(b) states, "Nothing in this part shall be deemed to require a license for.... An individual who manipulates the controls of a facility as part of his training to qualify for an operator license under this part under the direction and in the presence of a licensed operator or senior operator."

Contrary to the above, on August 18, 1982, an operator trainee was observed moving control rods during a startup of Unit 1 without direction from or in the presence of licensed operator or Senior operator.

Corrective Action Taken and Results Achieved

The control room manning was as required by the Technical Specifications at all times. Action was taken promptly to ensure the operator trainee was functioning under the direct cognizance of the Unit Operator. No unsupervised trainees are manipulating the reactor controls at this time.

Corrective Action Taken to Avoid Further Noncompliance

A copy of the noncompliance has been distributed to all station control room engineers (SCREs) to ensure that the crews are aware of the on-the-job training (OJT) requirements. Additionally, the Unit Operating Engineer reviewed the responsibilities of the Unit Operator and trainees, as well as other NRC concerns with each operating crew during the week of September 13, 1982.

Corrective Action Taken to Avoid Further Noncompliance (Cont'd)

Guidelines for control room trainees which include the requirements referenced in this non-compliance have been drafted and will be included in the "OJT Guide for Control Room License Trainees." Also LAP 1600-2, "Conduct of Operations," is being revised to add this list of guidelines.

Date of Full Compliance

Full compliance has been achieved. The guideline preparation and the revision to LAP 1600-2 identified in Corrective Action to Avoid Further Noncompliance will be completed by December 1, 1982.