

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-373/83-36; 50-374/83-35

Docket Nos. 50-373; 50-374

Licenses No. NPF-11; CPPR-100

Licensee: Commonwealth Edison Company  
Post Office Box 767  
Chicago, IL 60690

Facility Name: LaSalle County Station, Units 1 and 2

Inspection At: LaSalle Site, Seneca, IL

Inspection Conducted: September 14-16, 1983

Inspector: *T. Ploski*  
T. Ploski

10/3/83  
Date

Approved By: *M. P. Phillips*  
M. P. Phillips, Acting Chief  
Emergency Preparedness Section

10/3/83  
Date

Inspection Summary

Inspection on September 14-16, 1983 (Reports No. 50-373/83-36(DRMSP); 50-374/83-35(DRMSP))

Areas Inspected: Routine, announced inspection of the following areas of the emergency preparedness program: licensee actions on previously identified items; changes to the emergency preparedness program; and licensee audits. The inspection involved eight inspector-hours onsite by one NRC inspector.  
Results: No items of noncompliance or deviations were identified.

## DETAILS

### 1. Persons Contacted

- \*C. Sargent, Assistant Superintendent for Operations
- \*J. Lewis, GSEP Coordinator
- \*J. Ahlman, QA Engineer
  - D. Winchester, QA Inspector
  - D. Pristabe, Shift Control Room Engineer
  - G. Watts, Technical Staff
  - S. Majerchin, Central File Supervisor
  - R. Crawford, Training Supervisor
  - H. Barch, Training Instructor
  - R. Cassetto, Training Instructor
  - S. Seaborn, Training Instructor
  - W. Luett, License Instructor

\*Present at the September 15, 1983 exit meeting.

### 2. Licensee Action on Previously Identified Items

(Closed) Open Item 373/83-21-01: Label the control room dial indicating onsite wind direction to clarify that readings are the directions from which the wind is blowing. The inspector toured the Unit 1 portion of the control room and verified that an appropriate label had been placed by the wind direction dial. This item is considered closed.

(Closed) Open Item 373/83-21-02; 374/83-21-01: Revise Emergency Plan Implementing Procedure (EPIP) L2P 1310-1 to include the correct interpretation of the 15 minute notification requirement contained in 10 CFR Part 50, Appendix E, Section IV.D.3. The inspector reviewed Revision 4 to this EPIP, dated July 21, 1983, and noted that the aforementioned regulatory requirement is now correctly interpreted in Paragraph F.1. Appropriate licensee personnel had received training on the correct interpretation of this regulation in January and February 1983. This item is considered closed.

(Closed) Open Item 373/83-27-04; 374/83-27-04: Ensure that the Emergency Operations Facility (EOF), located near Mazon, Illinois can be fully operational within one hour after a decision has been made requiring its activation. The Mazon EOF is the primary EOF for both the LaSalle County and Dresden Stations. On September 14, 1983, the inspector observed licensee performance at this facility during the Dresden annual emergency preparedness exercise. Mazon EOF personnel assumed the responsibilities from their Technical Support Center and Corporate Command Center (CCC) counterparts in a timely manner. The EOF's Recovery Manager declared the EOF fully operational within one hour of the decision to activate this facility. This item is considered closed.

(Open) Open Item 373/83-27-06; 374/83-27-06: Provide adequate status boards in the Mazon EOF. Establish an administrative mechanism for transferring status board information onto hardcopy records. On

September 14, 1983, the inspector observed licensee performance at the Mazon EOF during the Dresden Station's annual emergency preparedness exercise. This is the primary EOF for both the LaSalle County and Dresden Stations. The inspector noted that, since the July exercise for the LaSalle County Station, the licensee had equipped the Mazon EOF with a number of status boards in addition to the previously installed blank status board. Appropriate status boards for the Dresden accident scenario were utilized during the September exercise, and a clerk was observed to be recording trended information prior to its being erased. Status boards and their usage during the September 1983 Dresden exercise represent a significant improvement over that observed during the July 1983 LaSalle County Station exercise. However, several status board refinements are appropriate, based on experience gained during the Dresden exercise. Additional information regarding EOF status board design and utilization during the 1983 Dresden exercise is provided in Inspection Report No. 50-237/83-28; 50-249/83-26. It is considered premature to close this Open Item.

(Closed) Open Item 373/83-27-07; 374/83-27-07: Provide adequate log-books for EOF Directors. On September 14, 1983, the inspector observed licensee performance at the Mazon EOF during the Dresden Station's annual emergency preparedness exercise. This facility is the primary EOF for both the LaSalle County and Dresden Stations. During that exercise, the inspector noted that suitable logbooks were provided in each Director's work area and that these logs were properly utilized during the exercise. This item is considered closed.

(Closed) Safety Evaluation Report, Revision 5, Item 374/81-00-31: Require evidence that procedures are in place (in the control room) that address all emergency communications, and that any individual who could be assigned as communications coordinator be adequately trained in these procedures before Unit 2 fuel load. EPIPs that relate to emergency communications from the station's control room include: LZF 1110-1 (Station Director - Acting Station Director Implementing Procedure); LZF 1220-1 (Emergency Telephone Number); LZF 1310-1 (Notifications); LZF 1320-1 (Augmentation of Plant Staffing); and LZF 1440-1 (Onsite GSEP Communications Systems). In addition, the following procedures which are updated quarterly, provide telephone number information: LZF 1700-1 (GSEP Station Group Director); LZF 1700-2 (Station Employee List); and LZF 1700-3 (Station Phone List). Copies of these EPIPs (LZF series procedures) are maintained in the control room.

The licensee's annual requalification training program for all licensed operators includes modules on the emergency plan (generic GSEP and LaSalle Annex), relevant EPIPs, and all emergency communications systems. In addition, control room personnel must complete an annual reading assignment on relevant EPIPs, which includes those related to emergency communications. Should procedures be revised between the annual reading requirement periods, the Station's Training Supervisor and License Instructor determine the significance of these revisions and ensure that licensed personnel are trained on appropriate revisions via a required reading package or a special training session. This item is considered closed.

### 3. Changes to the Emergency Preparedness Program

The inspector reviewed the licensee's records for distribution of the GSEP and EPIPs. The generic GSEP and LaSalle Annex have not been revised since issuance of the Safety Evaluation Report (NUREG-0519 and its Supplements). There have been no changes related to the emergency organizational structure or the administration of the emergency preparedness program since that time. Changes to station procedures regarding the updating of names and phone numbers are done on a quarterly basis by the GSEP Coordinator.

The inspector discussed the licensee's methods for accomplishing a procedure revision and for distributing EPIPs with the GSEP Coordinator and/or the Central Files Supervisor. The inspector also reviewed administrative Procedures LIP 820-2 (Station Procedure Preparation and Revision) and LAP 820-3 (Procedure Distribution), and reviewed documentation associated with the recent preparation and distribution of LZP 1310-1, Revision 4.

When the need for a new or revised procedure is recognized, a knowledgeable individual is tasked with preparing the draft. For example, Revision 4 to LZP 1310-1 resulted from a recent NRC inspection finding, as discussed in Paragraph 2 of this report. Licensee management issued an Action Item Record (AIR), which required the Rad/Chem Supervisor to prepare the revision. The AIR form contains provisions for documenting the following: the individual assigning the action item; the person responsible for completing it; the requested completion date; a description of the task; the reason for the action item; appropriate references; job status; and the task completion and final acceptance dates.

The person assigned to draft a procedure or revision, or his supervisor, initiates a Procedure Change Form, which describes the proposed change in procedures. The form is routed to the appropriate Department Head and the Office Supervisor for review. The draft, a procedure Cross Reference Sheet, and a Procedure Deficiency Sheet are prepared. The Office Supervisor reviews this package for completeness, format, and grammatical errors. This individual also designates on the Procedure Change Form, those personnel who must review and approve the draft. Central Files maintains separate folders for each station procedure which contain the original procedure and all its revisions. When a procedure change is in progress, a notation is made to the current revision's master copy on file. After internal review, the draft is returned to the preparer who ensures that appropriate review comments are incorporated. If the draft is rejected at any stage of the internal review process, it is returned to the preparer's Department Head with an explanation. The final draft procedure is retyped, proofread, and approved by the Assistant Superintendent for Administrative and Support Services and by the Station Superintendent.

The Office Supervisor receives the approved procedure, updates the master procedure index, and ensures that the procedure is properly distributed. Procedures become effective upon their distribution. Onsite procedure distribution is accomplished by Central File clerks personally inserting

procedure changes and an updated table of contents into the appropriate procedure binders assigned to station personnel. An Onsite Procedure Notification Form is left for the holders of procedure sets to inform them what specific changes had been made to their procedure binders. Offsite persons holding copies of station procedures receive an Offsite Procedure Notification Form which transmits the change pages and provides instructions on what is to be deleted from the holder's procedure manual. Regarding Revision 4 to LSP 1310-1, the inspector determined that all the aforementioned documentation was complete and readily retrievable from Central Files.

The current LaSalle Annex to the GSEP does not describe the station's permanent EOF located near Mazon, Illinois. Instead, a building now utilized as a training facility is described as the interim EOF. A revision to the generic GSEP is being prepared by the licensee, to be followed by revisions to the station specific annexes. The licensee should delete all references to the interim EOF and replace them with appropriate descriptions of the Mazon EOF in the next revision to the LaSalle Annex. This is an Open Item (373/83-36-01; 374/83-35-01).

Based on the above findings, this portion of the licensee's program is acceptable.

#### 4. Licensee Audits

An audit of the GSEP is conducted annually by the corporate Quality Assurance (QA) Department utilizing an audit matrix designed to ensure that all aspects of the audit required by 10 CFR 50.54(t) are included. In addition, an offsite review of the GSEP is conducted by the Nuclear Safety Group, which has no emergency response function. Recommendations for improvements made by the independent review group are documented and reported to corporate and plant management. Such recommendations, in addition to those made by the station onsite review group, Station Superintendent, and QA inspectors, are considered and acted upon. An administrative mechanism is in effect for tracking audit findings and identifying to corporate management those findings unresolved sixty days after an audit.

The inspector discussed the licensee's audit program with two QA Department inspectors and reviewed audit records of GSEP activities at the LaSalle County Station conducted during November and December, 1982. The former is termed an onsite audit since it was performed by personnel based at the Station, while the latter is referred to as an offsite audit since QA Department personnel not based at LaSalle conducted that audit. The 1983 onsite audit is scheduled for October 1983. The 1983 offsite audit was being conducted during the week of September 12, 1983. The inspector had previously reviewed records of an audit performed during January and February 1983 of corporate GSEP activities. Those audit records examined onsite were complete regarding identifying items examined, audit findings, and corrective measures taken as a result of negative findings.



QA Department personnel select specific items to be examined, based on audit matrix guidance that references the following topics, as described in the GSEP and LaSalle Annex: interface with State and local agencies; drills; exercises; capabilities; and EIPs. The audit reports addressed all of the topics. However, these 1982 audits and the 1983 corporate audit appear to be limited in scope in that they are based on the GSEP, and station specific annexes and EIPs. No audit included provisions to ensure that the regulations or changes to the regulations had been identified and addressed in the licensee's emergency preparedness program. The licensee's failure to identify a regulatory change promulgated in December 1982 and the consequences of this inaction were identified during a recent emergency preparedness inspection at the licensee's Quad-Cities Station (Inspection Reports No. 50-254/83-26; 50-265/83-25). This problem is considered generic to the licensee's nuclear generating facilities.

A critique is conducted at the conclusion of each drill and exercise. Weaknesses identified during the critiques are assigned for correction. This aspect of the licensee's emergency preparedness program was previously examined and discussed in Inspection Report No. 50-373/83-21 and 50-374/83-21.

Based on the above findings, this portion of the licensee's program is acceptable.

#### 5. Exit Meeting

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the onsite inspection on September 15, 1983. The inspector summarized the scope and findings of the inspection. The licensee agreed to review and consider the improvement items discussed.