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LaSalle Generating Station
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April 13, 1995

**United States Nuclear Regulatory Commission
Washington, D.C. 20555**

Attention: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-373/95002; 50-374/95002
NRC Docket Numbers 50-373 and 50-374.

Reference: 1. Lewis F. Miller, Jr. letter to R.E. Querio,
Dated March 16, 1995, Transmitting
NRC Inspection Report 50-373/95002; 50-374/95002.

Enclosed is ComEd's response to the Notice of Violation (NOV) and Notice of Deviation that were transmitted with the Reference 1 letter and NRC Inspection Report 50-373/95002; 50-374/95002

The reference 1 letter identified one violation concerning the failure to follow LaSalle Operating Procedure LOP-DG-05, "Startup of 1B(2B) Diesel Generator." The root cause of this violation was determined to be human factor deficiencies in procedure LOP-DG-05, that contributed to the failure of station personnel to follow the procedure. LaSalle County Station recognizes the importance of the accuracy and quality of our operating procedures and we are determined to establish and maintain a culture that demonstrates the appropriate regard for procedural adherence. Current efforts are underway to evaluate all our operating procedures to resolve human factor deficiencies, eliminate multiple action steps, and provide a logical, human factored flow path.

The reference 1 letter also identified one deviation concerning the failure to follow commitments to NRC Bulletin 90-0, Supplement 1. Our lack of self-assessment resulted in a failure to maintain trending of cumulative zero drift data on certain of our installed Rosemount transmitters. I have made my expectations clear to all levels of the site organization that fulfilling station commitments is a requirement. As LaSalle County Station strives to provide long term corrective actions, our utmost focus will be to enhance our self assessment efforts. This will result in meaningful improvements in the station's ability to identify, evaluate, and correct problems and deficiencies.

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If there are any questions or comments concerning this letter, please refer them to me
at (815) 357- extension 3600.

Respectfully,

A handwritten signature in dark ink, appearing to read "R. E. Querio", followed by a small flourish or mark.

R. E. Querio
Site Vice President
LaSalle County Station

cc: J. B. Martin, Regional Administrator, Region III
W. D. Reckley, Project Manager, NRR
P. G. Brochman, Senior Resident Inspector, LaSalle
D. L. Farrar, Nuclear Regulatory Services Manager, NORS
Central file

ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-373/94017, 50-374/94017

VIOLATION: 373(374)/95002-01

During an NRC inspection conducted on January 8 through February 17, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.2.A.a requires that written procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established, implemented, and maintained. Regulatory Guide 1.33 includes procedures for startup, operation, and shutdown of safety-related systems.

LaSalle Operating Procedure LOP-DG-05, "Startup of 1B(2B) Diesel Generator," Revision 20, step F.1.g.1.a, requires the diesel engine selector switch be placed in the local manual position.

Contrary to the above, on November 22, 1994, the diesel engine selector switch for the 1B diesel generator (DG) was not placed in local manual during performance of LOP-DG-05. This prevented the equipment operator from being able to locally shutdown the diesel by using the normal stop push-button.

This is a Severity Level IV violation (Supplement I).

DEVIATION: 373(374)/95002-05:

During an NRC inspection conducted on January 23 through 26, 1995, a deviation from your commitments to NRC Bulletin 90-01, Supplement 1, was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the deviation is listed below:

ComEd's response to NRC Bulletin 90-01, Supplement 1, was provided in a March 5, 1993, letter from Mr. D. J. Chrzanowski to Dr. Thomas E. Murley. The response for installed mature, medium pressure and low pressure transmitters stated, in part, that "LaSalle has, since issuance of the original Bulletin 90-01, maintained an enhanced surveillance program for these transmitters. This program will continue with a refueling outage surveillance frequency thereby maintaining confidence that transmitter failures can be detected..." Rosemount Technical Bulletin #4 recommended monitoring by trending the cumulative zero drift.

Contrary to the above, from July 1993 until January 1995, the licensee did not maintain an enhanced surveillance program for installed mature, medium pressure and low pressure Rosemount transmitters. Specifically, trending of cumulative zero drift (a parameter indicative of a loss of fill-oil condition) had not been performed.

ATTACHMENT (Continued)
RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-373/95002, 50-374/95002

REASON FOR VIOLATION: 373(374)/ 95002-01

On November 22, 1994, the 1B Diesel Generator (DG) was manually started in order to perform post-modification testing on the diesel governor shutdown solenoid. During the manual start of the 1B Diesel Generator, the Engine Selector Switch was mispositioned preventing local shutdown of the diesel. The Engine Selector Switch, located in the Main Control Room, was not placed in the LOCAL MANUAL position as required prior to the local start, due to the operator's failure to properly follow LaSalle Operating Procedure LOP-DG-05, "Startup of 1B(2B) Diesel Generator."

LOP-DG-05 contained multiple actions within step F.1.g.1.a which contributed to the Equipment Operator missing the action to have the Engine Selector Switch positioned from REMOTE MANUAL to LOCAL MANUAL. In addition, the Caution on the need to use the emergency stop push-button (rather than the local stop button to stop the Diesel Generator when in REMOTE MANUAL) was not placed prior to the step which initiates local start.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED
(373(374)/95002-01):

LOP-DG-05, "Startup of 1B(2B) Diesel Generator", has been revised to eliminate multiple action statements in one paragraph. A single-action instruction step now replaces steps with multiple actions and cautions placed to proceed the applicable action step. This revision resolves the human factors deficiencies in LOP-DG-05, "Startup of 1B(2B) Diesel Generator" and eliminates confusing steps dealing with transfer switch positions. This revision also resolves the human factors deficiencies in LOP-DG-05 which resulted in incorrectly performed actions and will prevent recurrence of this type of event. This procedure was revised on February 17, 1995. A revision to LEP-DG-105, "Maintenance and adjustment of Woodward UB 8 Governor Valve Shutdown Solenoids" was accomplished in Revision 7, December 2, 1994. The Equipment Operators have reviewed LAP-100-40, "Procedure Use and Adherence Expectations".

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS
(373(374)/95002-01):

All LaSalle Operating Procedures for Diesel Generator operations have undergone a complete review by System Engineering and Operations. All applicable procedures are being revised to resolve the human factors deficiencies, which could result in incorrectly performed action steps, and will prevent recurrence of this type of event. This complete

- revision of all the Diesel Generator operating procedures is expected to be completed by August 31, 1995.

The K-15 relay was sent to the Operational Analysis Department(OAD) for a failure analysis and the results of this analysis will be used to determine the root cause of the K-15 failure and the impact on other similar lockout relays.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (373(374)/95002-01):

Corrective action is completed and full compliance has been achieved with the completion of the procedure revision of LOP-DG-05, "Startup of 1B(2B) Diesel Generator", on February 17, 1995.

ATTACHMENT (Continued)
RESPONSE TO NOTICE OF DEVIATION
NRC INSPECTION REPORT
50-373/95002, 50-374/95002

REASON FOR DEVIATION: 373(374)/ 95002-05

A lack of self assessment and self checking created the situation that resulted in the deviation. Specifically, this deviation pertained to the recent elimination of category E and F Rosemount transmitters (transmitters with greater than 50,000 PSI* Months and transmitters with an operating pressure less than 500 psig) from the enhanced monitoring program. The System Engineer based his decision to eliminate these transmitters on documentation that he believed to be the LaSalle County Station's official response to NRC Bulletin 90-01, Supplement 1, "Loss of Fill Oil in Rosemount Transmitters". This documentation stated that, at our discretion, these transmitters would be eliminated from the enhanced monitoring. This was a draft response and was not our official docketed response to the NRC.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED
(373(374)/95002-05):

All of the category E and F transmitters were immediately placed into the enhanced monitoring program. The affected transmitters required only the addition of the most recent calibration information to update their records. None of the affected transmitters showed any signs of deterioration. All affected Rosemount transmitters are now included in the enhanced monitoring program.

CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER DEVIATIONS
(373(374)/95002-05):

Corrective steps were taken to include the affected transmitters into the enhanced monitoring program. The official ComEd response to NRC Bulletin 90-01, Supplement 1, "Loss of Fill Oil in Rosemount Transmitters" was included in the monitoring program files replacing the incorrect draft response document that the System Engineer had previously used to establish the enhanced surveillance and trending program. Only the official NRC docketed response will be retained in the System Engineer's program files.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (373(374)/95002-05):

Full compliance was achieved on February 10, 1995 when all category E and F transmitters were placed into the enhanced monitoring program.