



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

May 18, 1984

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road - Region III
Glen Ellyn, IL 60137

Subject: LaSalle Station Units 1 and 2
Response to Inspection Report Nos.
50-373/84-07 and 50-374/84-08
NRC Docket Nos. 50-373 and 50-374

Reference (a): R. L. Spessard letter to Cordell Reed
dated April 19, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. D. Walker and other member of your Staff on February 27 through March 30, 1984, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

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

Very truly yours,

D. L. Farrar

For
D. L. Farrar
Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT

COMMONWEALTH EDISON COMPANY
LASALLE COUNTY STATION UNITS 1 and 2
RESPONSE TO NOTICE OF VIOLATION

Dated April 19, 1984

ITEM OF NONCOMPLIANCE

1. 10 CFR 50, Appendix B, Criterion X, as implemented by Commonwealth Edison Company Corporate Quality Assurance Manual, Nuclear Generating Stations, Section 10, Revision 13, requires that "Inspection program will be established to provide assurance that the quality control inspection are performed. Quality Assurance inspection and testing will be conducted to verify conformances to applicable drawings, instructions and procedures as necessary to verify quality."

Contrary to the above, the licensee did not establish and execute adequate requirements to inspect and document the inspection results of safety related electrical conductor splices. Moreover, inspection records generated by H. P. Foley relative to crimping of lugs on electrical conductors did not identify the location of the splice nor the serial number of the crimping tool used. The electrical contractors work instruction WI-500 governs the splicing of electrical conductors.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The Unit 1 and Unit 2 safety related switchgear/MCC's, panels and electrical containment penetrations were inspected to locate and check butt splices installed to extend cable conductors. Repair packages were initiated and completed for all butt splices which failed either a pull (tug) test or the required visual inspection criteria. It should be noted, however, that the visual inspection criteria were upgraded after the inspection of the Unit 1 switchgear/Motor Control Centers and seven containment penetrations. This upgrade was the result of a concern that the pull (tug) test might disable a control circuit. Work Request #L34818 has been written to reinspect the 94 switchgear/MCC butt splices and the 11 Containment Penetrations butt splices identified during the first stage of the inspection to the upgraded visual inspection criteria (all of these 105 butt splices were acceptably pull tested during the initial inspection and are therefore not a concern for continued operation). Any splice found that does not meet these criteria will be replaced.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Electrical Maintenance and Contractor Procedures will be revised to include upgraded installation/inspection criteria as follows:

1. Electrical conductor splice correctly sized for the wires being connected.
2. Ends of the conductor strands are flush with or extend beyond the end of the terminal wire barrel (as seen through the inspection windows).
3. Butt splice covered with approved taping when required (Harsh environments).
4. Use of the proper crimping tool as recommended by manufacturer for that splice.
5. Any nicks or cuts identified in the conductor insulation are repaired.
6. Documented QC inspection including recording of the crimper identification number.

DATE OF FULL COMPLIANCE

1. Inspection and repair, as required, is complete.
2. Reinspection of the 105 butt splices to the upgraded inspection criteria (WR #L34818) will be done during the first available outage of sufficient duration.
3. Revised procedures will be placed by July 1, 1984.

ITEM OF NONCOMPLIANCE

2. 10 CFR 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Company Corporate Quality Assurance Manual, Nuclear Generating Stations, Section 5, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Operating procedures LAP-240-4 and LAP-240-6 require that administrative controls for "temporary system changes" such as electrical jumpers, lifted leads, removed fuses, etc...be adhered to and implemented.

Contrary to the above, the procedures were not adhered to in that temporary jumper #27 was found by the inspector to be terminated inside Unit II 480V switchgear 235Y, compartment 202A between OTB1-4 and OTB1-17. Schematic diagram 1E-2-422BAJ indicated that this jumper shorted out the permissive reactor water clean-up pump C interlock from an open limit switch contact of valve 2G33-F004.

This jumper (#27) was reported lost in October, 1983.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A search of all safety related Motor Control Center, Unit 2 Control Room and Auxiliary Electric Equipment Room Panels and all 4KV and 6.9KV Switchgear Auxiliary Compartments was performed and no other unauthorized jumpers were found.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

A revision is being made to LAP-240-6 "Temporary System Changes". The Operating and Technical Staff Departments will review LAP 240-4 "Shift Interface for Logic Test" and LAP-240-6 "Temporary System Changes" as part of their annual retraining.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

This corrective action will be completed by December 31, 1984.