



Commonwealth Edison

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Address Reply to: Post Office Box 767
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May 18, 1984

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

Subject: LaSalle Station Units 1 and 2
Response to Inspection Report Nos.
50-373/84-05 and 50-374/84-05
NRC Docket Nos. 50-373 and 50-374

Reference (a): C. E. Norelius letter to Cordell Reed
dated April 18, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. W. Guldemon, S. Guthrie and C. Evans on February 13 through March 23, 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,

J. S. Marshall

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 18, 1984

ITEM OF NONCOMPLIANCE

1. Technical Specification 3.0.4 states, "Entry into an OPERATIONAL CONDITION or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications."

Technical Specification 6.2A states, "Detailed written procedures including applicable checkoff lists covering items listed below shall be prepared, approved, and adhered to:

Instrumentation operation which could have an effect on the safety of the facility and surveillance and testing requirements."

Contrary to the above, on March 4, 1984 the isolation valves for instruments 1B21-N413 B and D were left closed contrary to the requirements of surveillance procedure LIS-NB-115 with the result that a Unit 1 operational condition change was made with Division II Low Pressure Coolant Injection systems inoperable.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. A discussion was held between the Plant Superintendent and the lead workman on the job to emphasize the importance of attention to detail.
2. A verification of valve position for these valves and all additional valves covered by LIP-GM-35, LOP-NB-01 Attachment C, plus other selected valves was conducted with no other valves found out of position.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

1. A review of all instrument surveillance procedures is being performed to ensure that they contain double verification when returning instruments to service.

2. LIP-GM-35 has been revised to incorporate verification of additional instrument valve positions following a shutdown of 72 hours or greater.
3. A tailgate session was held with Instrument Maintenance Department personnel to review this event and to emphasize that the mass production approach to signoffs is unsatisfactory.
4. LIS-NB-115 and LIS-NB-116 will be revised to include double verification when returning instruments to service.

DATE OF FULL COMPLIANCE

The above corrective action will be complete by August 1, 1984.

ITEM OF NONCOMPLIANCE

2. Technical Specification 6.2A states, "Detailed written procedures including applicable checkoff lists covering items listed below shall be prepared, approved, and adhered to: Preventive and corrective maintenance operations which could have an effect on the safety of the facility."

LaSalle Administrative Procedure LAP-240-6, "Temporary System Changes," requires that, in the absence of other formal controls, all temporary system changes be strictly controlled including review and approval, documentation, verification of change, and verification of system restoration.

Contrary to the above, the detector signal and high voltage leads for Intermediate Range Monitor B were lifted in the absence of administrative controls, including those of LAP-240-6, with the result that a reactor startup was conducted with the subject leads disconnected.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. All SRM and IRM cables were verified installed on Unit One and Unit Two.
2. IRM B cables were reconnected and IRM B subsequently functioned properly.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

1. LIP-GM-35 will be revised to add verification of proper IRM and SRM cables connection prior to startup following a shutdown of 72 hours or greater.
2. A meeting was held with the Instrument Department to re-emphasize the use of administrative controls.
3. Station management is currently evaluating the adequacy of administrative controls utilized by the Instrument Maintenance Department, with special consideration for situations/conditions which appear to increase the risk of a breakdown in control.

DATE OF FULL COMPLIANCE

The above corrective action will be complete by July 1, 1984.