



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

February 21, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 2055

Subject: LaSalle County Nuclear Power Station Unit 2
Notice of Violation
NRC Docket Number 50-374/92004

- References:
1. C. E. Norelius (NRC) letter
dated January 24, 1992 to Cordell Reed (CECo)
 2. C. E. Norelius (NRC) letter
dated January 7, 1992 to Cordell Reed (CECo)

This letter provides Commonwealth Edison Company's (CECo) response to the Notice of Violation as transmitted in Reference 1. An enforcement conference was held on January 21, 1992 to discuss the results of the NRC's inspection (Reference 2) of the events surrounding the radiological hazards in hydrolazing operations on the 2B Fuel Pool Cooling Heat Exchanger.

Commonwealth Edison acknowledges the violation as stated in the Notice. The attachment to this letter contains the immediate corrective actions taken as well as additional corrective actions which should be effective in precluding recurrence of the violation.

If there are any questions or comments regarding this response, please contact Denise Saccomando (708) 515-7585.

T. J. Koyach
Nuclear Licensing Manger

cc: A. Davis, Regional Administrator, Region III
B. Siegel, Project Manager, NRR
D. Hills, Senior Resident Inspector

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**ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-374/92004**

VIOLATION: IR 373/92004-01

10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with the requirements of Part 20 and which are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, on December 17, 1991, the licensee did not make surveys to assure compliance with that part of 10 CFR 20.101 that limits the radiation exposure to the extremities and whole body. Specifically, the licensee did not adequately evaluate the possible doses to workers prior to and during hydrolazing performed on the 2B Fuel Pool Cooling Heat Exchanger.

REASON FOR THE VIOLATION:

The violation occurred due to the failure to conduct a survey. The survey was not performed because of an inadequate turnover between the departing midnight Radiation Protection Shift Supervisor (RPSS) and the oncoming Radiation Protection Shift Supervisors.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED:

Worker doses were evaluated. Estimated doses exceeded administrative limits, however, the resultant doses did not challenge regulatory limits.

The Radiation Protection personnel involved in the inadequate turnover were counselled by the Health Physics Services Supervisor regarding their inadequate performance and reminded of Station expectations for conducting complete and accurate turnovers.

Quiet hours were established by the Health Physics Services Supervisor to ensure minimal distractions during turnover periods. A sign designating that a turnover is in progress is being used at the access to the turnover location as a visual reminder to station personnel.

The Station Manager issued a letter to all badged individuals on site emphasizing performance expectations regarding radiological activities. This includes the need to apply self checking practices to ensure that radiological requirements are appropriate for the work activities. Additionally, all department heads discussed the intent and meaning of this letter in depth with their staff members.

The event investigation also identified performance deficiencies involving two Radiation Protection Technicians and a Mechanic conducting the hydrolazing. These individuals were counselled regarding those performance deficiencies.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

The Radiation Protection Department will review current written communications practices to identify areas for improvement. This review will be completed by March 1, 1992.

The Station Training Department will review current Radiation Protection Technician training programs to determine if the existing training relative to the radiological aspects of radioactive/non-radioactive system interfaces can be enhanced. This review will be completed by April 1, 1992.

The Radiation Protection Department will reinforce self checking practices and the need to carefully review job specific RWPs prior to performing assigned job coverage with all Radiation Protection Technicians during the second quarter 1992 continuing training program. This training will be completed by July 1, 1992.

The Radiation Protection Department will review methods to improve the mechanism for the establishment of radiological hold points in work packages and/or RWPs to better identify RP activity requirements. This review will be completed by April 1, 1992.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved upon completion of the worker dose evaluations.