

June 26, 1984

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

Subject: LaSalle County Station Units 1 and 2

Response to Inspection Report Nos. 50-373/84-12 and 50-374/84-16 NRC Docket Nos. 50-373 and 50-374

Reference (a): C. J. Paperiello letter to Cordell Reed

dated May 29, 1984.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. T. Ploski and Ms. G. Christoffer on May 7-11, 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,

. L. Farrar

Director of Nuclear Licensing

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT

COMMONWEALTH EDISON COMPANY RESPONSE TO NOTICE OF VIOLATION

The item of noncompliance identified in Appendix A of the NRC letter dated May 29, 1984 is responded to in the following paragraphs:

10 CFR 50.54(q) requires in part that a licensee authorized to possess and/or operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b) of this part and the requirements in Appendix E to this part. 10 CFR 50, Appendix E, Section IV.D.3 states in part that a licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring a emergency.

Contrary to the above, the licensee did not have the capability to notify off-site agencies within 15 minutes as demonstrated during the period from April 9, 1983 through April 29, 1984, when on all seven occasions the licensee did not initially notify the responsible State agency of an emergency at the LaSalle County Station within 15 minutes from the time of emergency declaration.

Corrective Action Taken and Results Achieved

On May 21, 1984, LaSalle Station Training Department commenced retraining on current notification procedures. This training will be completed by August 1, 1984. In addition, a review of the notification procedure was conducted by Corporate Emergency Planning and the recommended changes are provided below.

Corrective Action Taken to Avoid Further Non-Compliance

Corporate Emergency Planning shall issue a letter to all Station Superintendents reiterating the importance of the 15 minute requirement. The letter shall contain instructions to Station Directors/Acting Station Directors to ensure the requirement is met. These instructions shall indicate that the NARS call on the appropriate NARS Code shall be made without contacting System Power Supply Office (SPSO) if insufficient time remains to meet the requirement. A subsequent call shall be made to SPSO. This letter shall require that personnel log the time the State of Illinois and, as applicable, Iowa or Wisconsin was notified.

A letter shall be written to the SPSO reiterating the importance of the 15 minute notification requirement. This letter shall indicate when the 15 minute clock starts. Instructions to SPSO shall indicate that the NARS call shall be made without contacting the Nuclear Duty Officer if insufficient time remains to meet the requirement.

A subsequent call by the SPSO shall be made to the Nuclear Duty Officer. The letter shall also require that the following log entries be made:

- a) The time the NARS message was received from the station,
- b) the time the State of Illinois and, if applicable, Iowa or Wisconsin was notified, and
- c) the time the Nuclear Duty Officer was notified.

Finally, as an additional enhancement, it is Commonwealth Edison's intent to establish new NARS codes which will allow the Shift Engineer to notify the State of Illinois and, if applicable, Iowa or Wisconsin and the SPSO with a single phone call. However, NARS is operated and maintained by the State of Illinois and requires its concurrence for any change. Full compliance is considered achieved upon issuance of guidance by the corporate GSEP Staff and subsequent training at each plant.

Date of Full Compliance

Full compliance will be achieved by August 1, 1984.