



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

June 5, 1992

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

Subject: LaSalle County Nuclear Power Station Units 1 and 2  
Response to Notice of Violation  
Inspection Report Nos. 50-373/92008; 50-374/92008  
NRC Docket Nos. 50-373 and 50-374

Reference: B. Clayton letter to Cordell Reed dated May 6, 1992  
transmitting NRC Inspection Report 50-373/92008;  
50-374/92008

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. The NOV cited one Severity Level IV violation related to procedural adherence deficiencies. CECo acknowledges the violation and the NRC's concern of this violation due to its recurring nature. CECo's response is provided in Attachment A.

If your staff has any questions or comments concerning this transmittal, please refer them to Jim Watson, Compliance Engineer at (708) 515-7205.

Sincerely,

T.J. Kovach  
Nuclear Licensing Manager

Attachments

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

600004  
9206100042 920605  
PDR ADOCK 05000373  
G PDR

ZNLD/1845/1

IEO/11

## ATTACHMENT A

### RESPONSE TO NOTICE OF VIOLATION

NRC Inspection Report  
50-373/92008; 50-374/92008

#### **VIOLATION** (373/92008-01a, 01b, and 01c)

LaSalle Technical Specification 6.2.A.1 requires, in part, that detailed written procedures covering items in Regulatory Guide 1.33, Appendix A, Revision 2, be prepared, approved, and adhered to. Regulatory Guide 1.33 lists procedures for the control rod drive and liquid radioactive waste systems.

Contrary to the above, procedures for the control rod drive and liquid radioactive waste systems were not adhered to in the following examples:

- a. Non-licensed operators did not leave open the accumulator waterside drain valves in accordance with LaSalle Operating Procedure LOP-RD-10, "Control Rod Drive (CRD) System Accumulator Initial Charging," Revision 9, steps D.4 and F.10.b, during accumulator precharging on February 10, 1992.
- b. Non-licensed operators did not verify that a hose was in place between the discharge and the chemical waste sump in accordance with LOP-WF-29, "Transfer of Floor Drain Concentrator Feed Tank 1A to Chemical Waste System," Revision 2, steps C.6 and F.1.a on February 16, 1992.
- c. Non-licensed operators did not complete Attachment B, "CRD Accumulator Charging Checklist," in accordance with LOP-RD-10, "CRD System Accumulator Initial Charging," Revision 9, step F.26, or LOP-RD-20, "Control Rod Accumulator Recharging/Water Removal," Revision 1, step F.9, for the majority of accumulator alarm responses between January 1 through March 19, 1992.

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

#### **REASON FOR THE VIOLATION:**

Concerning the issue relative to LOP-RD-10, steps D.4 and F.10.b, Commonwealth Edison acknowledges the violation. This event involved the failure to open the waterside drain valves during accumulator charging on 2/10/92. Non-licensed operators and a technical staff engineer were working on returning the CRD system to service following major repairs on the system during a refuel outage. The operators were charging the accumulators in a manner not part of the approved procedure. The technical staff engineer concurrently was testing the scram valves. As a result of the operators not properly performing the charging procedure and a lack of specific communication between the technical staff engineer and the operators, concerning the status of accumulator charging, a single rod was inadvertently scrammed.

## ATTACHMENT A

### RESPONSE TO NOTICE OF VIOLATION

NRC Inspection Report  
50-373/92008; 50-374/92008  
(continued)

Concerning the issue relative to LOP-WF-29, Commonwealth Edison acknowledges the violation. This event involved not verifying that a transfer hose was properly installed in a sump during the transfer of the 1A Floor Drain Concentrator Feed Tank. The operator believed, from previous information, that the hose was in place and did not reverify its placement. However, this hose had been removed to accommodate cleaning of the floor and was not reinstalled. This cleaning had been accomplished between the previous visual observation of proper hose installation and the actual tank transfer.

Concerning the issue relative to LOP-RD-20, Commonwealth Edison acknowledges the violation. This event involves not properly documenting on the Attachment B of this procedure the response to accumulator trouble alarms. This lineup documentation required double verification of valving. Although original valve position was documented, requirements for second verification which is performed on the same document, caused some of the paperwork to become lost.

Commonwealth Edison considers these events concerning procedure adherence to be serious situations and has taken steps to continually reinforce the importance of properly adhering to procedures with all operating personnel. Additionally, due to the recurring events involving procedure adherence, upper station management has created a task force to seek resolution of this issue as well as procedure adequacy. The task force initially consists of all station departments with bargaining unit, first line supervisors, and senior station management representation.

#### CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED:

Each event was thoroughly investigated by upper station management. In addition to evaluating the facts of each event, the personal performance history of each individual was also reviewed. Based on the review, the following corrective actions were taken.

Concerning the issue relative to LOP-RD-10, steps D.4 and F.10.b, the operators involved were counseled concerning their unsatisfactory performance in failing to follow the procedure. Also, the operators and technical staff engineer were apprised of the importance of clear concise communications.

Concerning the issue relative to LOP-WF-29, the non-licensed operator involved was counseled and a letter placed in his file relative to this event. In addition, members of this crew made a presentation to all six crews concerning the need and importance of following procedures.

**ATTACHMENT A**  
**RESPONSE TO NOTICE OF VIOLATION**

NRC Inspection Report  
50-373/92008; 50-374/92008  
(continued)

Concerning the issue relative to LOP-RD-20, a procedure change was made to the annunciator response procedure LOA 1(2)H13-P603 A503, "CRD HYD ACCUM TROUBLE". This change directs the NSO to ensure that the proper attachment is filled out by the non-licensed operator when responding to the accumulator alarms.

In addition to the above actions directed at the specific events, a daily order was issued to operations regarding the need to properly follow procedures. Also a meeting was held with upper station operating management and the shift engineers; at this meeting, the need for properly following station procedures was reinforced.

**CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS:**

The Station Manager is conducting meetings with station personnel which includes a discussion on procedure adequacy and the importance of properly adhering to procedures. This will be completed on September 1, 1992.

Also, the shift engineers have stressed to their respective crews the importance of properly adhering to procedures and discussed the results of the shift engineer and upper station operating management meeting.

A task force has been created and will meet periodically throughout the SALP 11 period to review, propose, and implement possible solutions to the procedure adherence issue at LaSalle Station. The first formal meeting was held June 4, 1992.

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:**

Based on corrective steps taken and the results achieved, full compliance has been achieved.