

Commonwealth Edison Company
LaSalle Generating Station
2601 North 21st Road
Marseilles, IL 61341-9757
Tel 815-357-6761

ComEd

September 25, 1995

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Licensee Event Report #95-015-00, Docket #050-373 is being submitted to your office in accordance with 10CFR50.73(a)(2)(i)(B).

Sincerely,



D. J. Ray
Station Manager
LaSalle County Station

DJR/CD/lja

Enclosure

cc: H. J. Miller, NRC Region III Administrator
P. G. Brochman, NRC Senior Resident inspector
R. J. Zuffa, IDNS Resident Inspector
F. Niziolek, IDNS Senior Reactor Analyst
INPO - Records Center
D. L. Farrar, Nuclear Regulatory Services Manager

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) LaSalle County Station Unit 1	DOCKET NUMBER (2) 05000373	PAGE (3) 1 OF 4
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TITLE (4)
Missed Technical Specification Fire Protection Valve Surveillance

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
08	24	95	95	-- 015 --	00	09	25	95	None	
									FACILITY NAME	DOCKET NUMBER

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

OPERATING MODE (9) N	20.2201(b)	20.2203(a)(3)(i)	50.73(a)(2)(iii)	73.71(b)
	20.2203(a)(1)	20.2203(a)(3)(ii)	50.73(a)(2)(iv)	73.71(c)
POWER LEVEL (10) 000	20.2203(a)(2)(i)	20.2203(a)(4)	50.73(a)(2)(v)	OTHER
	20.2203(a)(2)(ii)	50.36(c)(1)	50.73(a)(2)(vii)	(Specify in Abstract below and in Text, NRC Form 366A)
	20.2203(a)(2)(iii)	50.36(c)(2)	50.73(a)(2)(viii)(A)	
	20.2203(a)(2)(iv)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(B)	
	20.2203(a)(2)(v)	50.73(a)(2)(ii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Carlos Diaz, Fire Protection System Engineer, Extension 2507	TELEPHONE NUMBER (Include Area Code) (815) 357-6761
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).	<input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH 12	DAY 15	YEAR 95
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On August 24, 1995, during a review of the LaSalle Fire Protection Program (FP) surveillances, it was discovered that valve 1FP228, Cable Spreading Room (CSR) Sprinkler System Isolation Valve, was not included in Procedure LOS-FP-M3, "Fire Protection Flow Valve Check Program". Valve 1FP228 was installed as part of the Unit 1 CSR sprinkler system modification in 1985-1986 but was never added to the FP valve surveillance procedure. This created a condition outside the surveillance requirement of Technical Specifications 4.7.5.2.a and 4.7.5.2.b. The valve was immediately verified to be in its correct position and was exercised through one cycle of full travel.

The root cause of this event can be attributed to an insufficient review of Technical Specification Fire Surveillances during the modification process.

This report is being submitted per 10CFR50.73(a)(2)(i)(B).

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
LaSalle County Station Unit 1	05000373	95	-- 015 --	00	2 OF 4

TEXT (if more space is required, use additional copies of NRC Form 366A) (17)

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

A. CONDITION PRIOR TO EVENT

Unit(s): 1/2 Event Date: 08/24/95 Event Time: 1120 Hours
 Reactor Mode(s): 1/1 Modes(s) Name: Run/Run Power Level(s): 100%/100%

B. DESCRIPTION OF EVENT

As a result of recent technical specification surveillance deficiencies, LaSalle initiated a comprehensive review of the Technical Specification Surveillance Program. This review was initiated on August 14, 1995. The following was the first identified discrepancy associated with this review activity. All subsequent Technical Specification surveillance discrepancies identified as a part of this review effort will be documented as a supplement to this LER.

On August 24, 1995, with both Units 1 and 2 in Mode 1 (Run), it was determined that Valve 1FP228, Cable Spreading Room (CSR) Sprinkler System Isolation Valve, was not included in the Fire Protection (FP) [KP] Valve Surveillance Program. Technical Specification 4.7.5.2.a requires deluge and sprinkler systems be demonstrated operable at least once per 31 days by verifying that each valve in the flow path is in its correct position. Technical Specification 4.7.5.2.b further requires the licensee to demonstrate operability of these systems at least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.

C. CAUSE OF EVENT

The Unit 1 CSR sprinkler system was modified in 1985-1986. Valve 1FP228 was installed as part of the Unit 1 CSR sprinkler system modification but was never added to the surveillance program. This oversight is attributed to an insufficient review of fire protection surveillances during the preparation and closure of the modification.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
LaSalle County Station Unit 1	05000373	95	-- 015 --	00	3 OF 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

D. ASSESSMENT OF SAFETY CONSEQUENCES

Although this valve was never included in the surveillance program, the impact on the safe operation of the system is considered minimal. The valve was verified to be in its full open position with chain and lock in place as required by LAP-240-1, "Use of Locks on Valves". Water flow to the valve was verified to be available through the performance of the monthly water flow surveillance, LOS-FP-M4, "Fire Protection Sprinkler and Deluge System Valve Lineup and Alarm Check". Based on this information, the sprinkler system was capable of fulfilling its designed safety function.

Since the system would have operated as designed, this event did not have any impact on the safety related equipment nor would it have adversely affected the station's safe shutdown capability.

E. CORRECTIVE ACTIONS

The initial corrective action was to implement a fire watch in the Unit 1 Cable Spreading Room (CSR). The Operating Department immediately verified that Valve 1FP228 was in its correct position and proceeded to fully cycle and lube the valve. Additionally, the surveillances on Valve 2FP228, located in the Unit 2 CSR, were verified to be current.

A Procedure Deficiency Sheet was submitted on August 24, 1995, to revise Procedure LOS-FP-M3, "Fire Protection Flow Valve Check Program", and to include Valve 1FP228 on the LOS-FP-M3, Attachment 1A, "Unit 1 Fire Protection Flow Path Valve Position Check Sign-Off Sheet". This valve was also verified to be included in LOP-FP-02M, "Mechanical Checklist", and LAP-240-1C, "Unit 1 Fire Protection Locked Valve Position Checklist". Revision 23 of LOS-FP-M3 includes Valve 1FP228 and will be completed prior to conducting the next surveillance.

The Fire Protection Design Checklist has been revised. The checklist is now more comprehensive and is designed to aid the modification engineer in properly completing the Fire Protection Review. All designs affecting fire protection are now routed to a single point of contact who has responsibility for maintaining the fire protection documents. His responsibility for the Fire Protection Program coupled with the revised checklist will aid in preventing recurrences of this type.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
LaSalle County Station Unit 1	05000373	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 OF 4
		95	-- 015 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

E. CORRECTIVE ACTIONS (Continued)

The modification process was verified to ensure adequate guidance is given to cover the necessary requirements for addressing procedure changes, including surveillance procedures. This event will be included in the Engineering and Support Training module as a "Lesson Learned" regarding the importance of rigorously addressing the administrative changes brought about by the modification process.

The review of the Fire Protection Procedures and Surveillances continues to be performed.

F. PREVIOUS OCCURRENCES

LER Number	Title
373/89-015-00	Missed Fire Protection Valve Position Verifications Due to Procedural Error.
373/95-012-00	Missed Fire Protection Valve position Verifications due to Management Deficiency

G. COMPONENT FAILURE DATA

Since no component failure occurred, this section is not applicable.