



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

November 2, 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. 50-373/84-23 and 50-374/84-30  
NRC Docket Nos. 50-373 and 50-374

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. D. Evans, S. Guthrie, and M. Jordan on August 12 through September 11, 1984, of activities at LaSalle County Station Units 1 and 2. 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.

As identified in your letter of October 4, 1984 you requested a detailed description of the operational actions that are being taken to improve control room operations and adherence to procedures. While many of the actions taken are identified in the response to the individual items of non-compliance, a summary of the steps taken is detailed below.

- a. Senior station management has held meetings with licensed operators stressing the importance of strict adherence to procedures, and the need to assure the status of plant equipment is clearly understood. In order to assure all licensed operators understand the regulatory concerns regarding operating performance the results of the SALP 4 appraisal were also reviewed emphasizing the identified weaknesses.
- b. The Assistant Superintendent of Operations has renewed open discussion meetings with all operating personnel to again convey the message that plant safety and compliance with procedures and regulations takes precedent over power production.
- c. The responsibility for verifying the status of equipment has been more clearly defined via procedure changes. The changes reinforced the responsibility of the reactor operator to know and record the status of Technical Specification related equipment.

8411290378 841116  
PDR ADOCK 05000373  
Q PDR

NOV 5 1984

J. G. Keppler

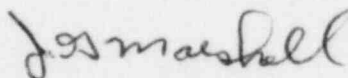
- 2 -

November 2, 1984

Based upon the actions taken it is believed that your concerns with adherence to procedures and control room operations have been properly addressed.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,



for D. L. Farrar  
Director of Nuclear Licensing

lm

Attachment

cc: NRC Resident Inspector - LSCS

9400N

ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO NOTICE OF VIOLATION

ITEM OF NONCOMPLIANCE

1. Technical Specification 3.6.1.8 states that with a drywell and/or suppression chamber purge supply and/or exhaust butterfly isolation valves open for other than inerting, deinerting, or pressure control, or not blocked to less than or equal to 50° open, close the butterfly valves within one hour or be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours.

Contrary to the above, on August 12, 1984, a Limiting Condition for Operation was exceeded for Technical Specification 3.6.1.8 in that the reactor was not in cold shutdown within 24 hours after the initiation and continuing operation of the drywell purging system, for an activity other than inerting, deinerting, or pressure control.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The drywell vent/purge system was secured immediately upon discovery that the allowable Technical Specification time clock period had been exceeded. This terminated the LCO violation which had existed for two and one half hours beyond the allowable 24 hour action statement.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The LCO time clock violation was due to oversight by plant personnel. Several measures have been implemented to prevent a recurrence of LCO time clock violations. These measures may be classified as initial, interim, and final.

Initial measures include the utilization of an alarm clock for the SCRE's desk to aid in tracking LCO time clocks. A meeting with the Operating Department Supervisors was also conducted. At this meeting, the Station Superintendent and the Assistant Superintendent of Operations emphasized the importance of LCO time clock adherence and proper log entries.

The interim measures were implemented while a total revision of LCO time clock control was being conducted. These measures include use of the alarm clock aid for the SCRE's, a visual display on an easel in the Control Room of LCO time clocks in effect, and the assignment of an additional person in the Control Room whose primary function is to monitor Action Statement time clocks. The additional person is assigned on weekdays during the day shift when the work activities are the greatest.

Procedure changes were also implemented to clarify the requirements to log all LCO time clocks in effect in the unit operator log.

The final long-term corrective measures currently in place consist of the following actions:

The Unit and Center Desk Log procedures LAP-220-2 and 3 have been revised to identify clearly the responsibility of the Control Room Operators to log all LCO time clocks in effect on each unit. These changes reflect the results of the long-term LCO time clock review committed to in our response to I.E. noncompliance 274/04-23-01 (BRP).

A procedure for overall control of Technical Specification LCO time clocks, LAP-1600-11, was also implemented to provide Operating personnel instruction on the use of Control Room visual displays, the alarm clocks and the responsibility for recording time clock information.

A second discussion was held on September 26 and October 3 with the Licensed Operators by Station management following the enforcement conference associated with this event. The necessity for LCO time clock compliance was reemphasized as well as the responsibilities of NSO's and SCRE's regarding time clocks.

The use of an additional person in the Control Room to monitor time clock adherence will be continued through completion of the Unit 1 surveillance outage and then may be terminated when it is clear the additional control is no longer necessary.

DATE OF FULL COMPLIANCE

Full compliance was achieved when the drywell vent/purge was returned to service August 12, 1984. All corrective action to prevent recurrence has been completed.

ITEM OF NONCOMPLIANCE

2. Technical Specification 6.2A requires, in part, that detailed written procedures shall be adhered to for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Included in Appendix A of this Regulatory Guide are procedures for shift and relief turnover and log entries.

Contrary to the above, the following examples of failure to adhere to procedures were identified:

- a. On August 11, 1984, the Unit 2 reactor operator failed to adhere to the requirement contained in Procedure LAP 200-3, "Shift Change", in that no entry was made to the Degraded Equipment Log for operation of the Drywell Purge System while in the Action Statement of Technical Specification 3.6.1.8.
- b. On August 11-12, 1984, Unit 2 reactor operators for four subsequent shifts failed to adhere to the requirements contained in Procedure LAP 220-2, "Unit Operator's Log", in that no entries were made to the Unit Operator's Log for the startup and shutdown of the Drywell Purge System or for the continued operation of that system when it constituted an abnormal plant condition.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The Assistant Superintendent of Operations discussed with the individual responsible for the required Degraded Equipment Log entry the necessity of strict compliance with Station procedures. Additionally, the Station Superintendent and Assistant Superintendent of Operations stressed the necessity of compliance with procedures in a discussion with Licensed Operators on September 19 and October 3, 1984.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Procedure changes to LAP-220-2, "Unit Operators Log", and LAP-220-3, "Center Desk Operators Log", have been made to more clearly identify the required log entries as they apply to Technical Specification LCO time clock actions.

DATE OF FULL COMPLIANCE

Full compliance was achieved on October 3 following completion of the management discussions with the Licensed Operators and implementation of initial procedure changes to LAP-220-2. The change to LAP-220-3, has now been completed.

ITEM OF NONCOMPLIANCE

- 3.a Technical Specification 6.2.A.7 requires, in part, that detailed written procedures be prepared, approved, and adhered to including responses to control room alarms.

LaSalle Procedure LAP 1600-2, "Conduct of Operations", Paragraph F.1.aa, requires the operators to know the reason for an annunciator which is in the alarmed condition while he is on duty. Also paragraph F.1.y requires the control room operator to be alert and attentive to control room instrumentation at all times and frequently monitor control room instrumentation and annunciator status to detect abnormalities and identify trends in important parameters.

Contrary to the above:

- 3.a A safety relief valve lifted twice which caused several annunciators, alarms, and parameter changes, and the operators did not determine that the valve lifted.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The occurrences of lifted SRV's were identified upon subsequent review of the available recorder charts and computer printouts. An investigation revealed the cause to be a ground on the power supply to the "C" solenoid valve. This condition has been corrected.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

An evaluation of the alarm circuitry indicates that it is possible for very short duration alarm signals to pass thru giving only an intermittent annunciator alarm in the control room. A change to the alarm response procedure has been made. The procedure now provides better direction regarding the use of all available information resources in evaluating the validity of an alarm.

Discussions on the event stressing response to alarms were held with licensed operators by the Station Superintendent and/or Assistant Superintendent of Operations. These discussions were completed on October 3, 1984.

Additionally, followup training on the event and the procedure revisions will be included in LRRR-8 for all licensed operators.

DATE OF FULL COMPLIANCE

With the exception of the additional followup training, the above items have been completed. The station is continuing its effort to eliminate trivial or bogus alarms and computer inputs.

ITEM OF NONCOMPLIANCE

- 3.b Technical specification 6.2.A.7 requires, in part, that detailed written procedures be prepared, approved, and adhered to including responses to control room alarms.

LaSalle Procedure LAP 1600-2, "Conduct of Operations", Paragraph F.1.aa, requires the operators to know the reason for an annunciator which is in the alarmed condition while he is on duty. Also paragraph F.1.y requires the control room operator to be alert and attentive to control room instrumentation at all times and frequently monitor control room instrumentation and annunciator status to detect abnormalities and identify trends in important parameters.

- b. The operator did not recognize the significance of two annunciators that came up as a result of surveillance testing on the reactor building ventilation and failure to clear the annunciator signal resulted in a reactor building ventilation isolation upon authorization for removal of a set of electrical jumpers.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Following the isolation of the reactor building ventilation system during testing the cause of the isolation was found to be the reactor building radiation monitors which had not been reset at the instrument drawer. The monitors were reset and the reactor building ventilation system returned to normal.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The Station Superintendent and/or Assistant Superintendent have discussed this event with operating personnel. This discussion included the importance of responding promptly to plant conditions and alarms.

Formal training has been conducted on the circuitry involved and the action necessary to reset alarms. Awareness of and response to annunciators, and changes to procedures were included in the topics covered.

The applicable annunciator response procedures have been revised to reflect lessons learned.

DATE OF FULL COMPLIANCE

The discussions with operating personnel were completed on October 3, 1984. The formal training required has been completed.

The procedure changes have been completed.

ITEM OF NONCOMPLIANCE

- 4.a Technical Specification 6.2.A.7 requires, in part, that detailed written procedures be prepared, approved, and adhered to for surveillance and testing requirements.
- 4.a Contrary to the above, on August 25, 1984, during the performance of LIS-NB-09, the mechanic operated switch PS-1 B21-N045C when the ATWS control switch was aligned to the "TEST" position for switch PS-1 B21-N045A, which resulted in the trip of the 1B recirculation pump from 100% power.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

All Instrument Maintenance personnel were retrained on the specific Trip Logic circuit.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Procedure was revised to clarify the placing of the bypass switch to the proper position.

DATE OF FULL COMPLIANCE

October 25, 1984

9400N



ITEM OF NONCOMPLIANCE

- 4.b Technical Specification 6.2.A.7 requires, in part, that detailed written procedures be prepared, approved, and adhered to for surveillance and testing requirements.
- 4.b Contrary to the above, LES RP-102, "RPS Electric Power Monitoring Assembly Channel Functional Test by O.A.D.", was not adequate in that an electrical divisional crosstie was not recognized in the procedural review chain, resulting in two subsequent isolations of the reactor building ventilation system on August 24, 1984.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The event was reviewed to determine the inadequacies of procedure. Procedure LES-RP-102 has been revised to use the operating procedure for transferring RPS buses. LES-RP-103 which also requires transferring RPS buses has also been revised.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

1. The operating procedure for transferring RPS busses, LOP-RP-01 will be revised to incorporate the lessons learned from this event. In addition, a description of what actions will occur when RPS busses are transferred will be added to the procedure.
2. This event will be incorporated into the training program so that the unusual system interactions which occurred will be more generally known.
3. The design of the "B" manual pushbutton is being reviewed to determine if a circuit revision is worthwhile to prevent the Division I isolation from occurring upon the loss of the "B" RPS bus.

DATE OF FULL COMPLIANCE

Item 1	November 15, 1984
Item 2	December 10, 1984
Item 3	January 10, 1985