Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
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November 29, 1984

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

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report
Nos. 50-373/83-52 and 50-374/83-55
NRC Docket Nos. 50-373 and 50-374

Reference (a): October 26, 1984 letter from J. G. Keppler to J. J. O'Connor.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Mr. R. D. Lanksbury on November 8, 1983 through October 22, 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,

D. 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

ITEM OF NONCOMPLIANCE

10 CFR Part 50, Appendix B, Criterion III, as implemented by Commonwealth Edison Quality Assurance (QA) Manual, Quality Requirement QR No. 3.0, requires that the review and evaluation of the design of nuclear related systems and components assure that these designs will conform to the Safety Analysis Report (SAR) commitments.

Contrary to the above, CECo failed to assure that the LaSalle containment isolation valves conformed to design requirements in the LaSalle Final Safety Analysis Report (FSAR) Amendment L, Section L.29 and in CECo's response to FSAR Question 031.285 (which is incorporated in the FSAR) which state that valves should not reposition upon resetting of an Engineered Safety Feature actuation signal. Specifically, in addition to the 55 valves identified in CECo's December 8, 1981 response, six Unit 1 and two Unit 2 containment isolation valves will assume their initial position upon reset of the containment isolation (Engineered Safety Feature) signal.

Discussion

An NRC inspector observed that certain test equalization valves, 1E 21-F333, 1E 22-F354, 1E 51-F354, and 1E 51-F355, and warming valves 1 & 2 E12-F099 A & B, which are all normally closed, remote manually operated valves with limited use per year, were not in compliance with design requirements of Item II.E.4.2 of NUREG 0737 or FSAR Question 031.285 which implemented IE Bulletin 80-06 for LaSalle.

Commonwealth Edison's reasons for not modifying these valves were reviewed by the NRC staff with the conclusion that CECo should have either modified the Unit 1 valves (6 remaining exceptions as listed above) and the Unit 2 valves (2 remaining exceptions as listed above), or reported them in their original submittals to NUREG 0737.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Unit 2

The test equalization valves 2E21-F333, 2E22-F354, 2E51-F354, and 2E51-F355 were removed from Unit 2 prior to issuance of the Operating License (NPF-18). Their removal was reported in Commonwealth Edison's letter of November 28, 1983 and acknowledged in SSER #8, March 1984. The warming valves 2E12-F099 A and B had modifications to their isolation logic before Unit 2 received approval for operation above 5% power. This modification was reported by Commonwealth Edison letter of February 4, 1984. A field inspection by NRC acknowledged completion of this modification on March 12, 1984. SSER #8, March 1984, acknowledged fulfillment of this Condition of License which removed the interim use of Caution Cards on the controls for these warming valves.

Unit 1

Edison committed to modify the logic for warming valves 1E12-F099 A and B prior to startup following the first refueling outage. This was communicated to the NRC by the Commonwealth Edison letter of November 28, 1983. In the interim, Edison relies on the use of Caution Cards on the control switches for these two valves as committed per CECo letter of December 7, 1983.

Edison also committed in the November 28, 1983, letter to remove the test equalization valves 1E21-F333, 1E22-F354, 1E51-F354, and 1E51-F355 from Unit 1 prior to startup following the first refueling outage. The Commission agreed to these commitments as evidenced in Section 22.2 of SSER #8, March 1984. NFP-11 does not have an open Condition of License on this subject.

For the sake of completion, it is also noted that the NRC staff agreed that RCIC steam inlet supply valves 1 & 2 E51-F008 and 1 & 2 E51-F063 were not containment isolation valves of concern under Item II.E.4.2 of NUREG 0737 nor FSAR Q 031.285. This is acknowledged in Section 22.2 of SSER #8 and in the Notice of Noncompliance.

Commonwealth Edison reporting of compliance to these requirements was documented with a revision to FSAR Appendix L, Section L.29, wherein coverage of the subject valves was included as the response to Item II.E.4.2, Containment Isolation Integrity. Also the response to FSAR question 031.285 was revised to address the deletion or modification of these valves. Both of these recording actions were formally accomplished via FSAR Amendment 64 (March, 1984).

The result of corrective actions on Unit 2 have proven satisfactory in that reset of isolation signals cannot interact adversely because the valves were removed or modified. For Unit 1, the engineering change notices have been written and the field modification packages have been released for correction of the warming valves and for removal of the test equalization valves.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The management and engineering reviews of FSAR submittals, including responses to questions and special TMI topics such as NUREG 0737 were discussed at the Enforcement Conference of November 1983. As a result of review and discussion, Commonwealth Edison has concluded that this was an isolated event. Appropriate management controls are in place to provide confidence in NRC submittals and incorporation of FSAR commitments into plant design.

DATE OF FULL COMPLIANCE

Full compliance for LaSalle Unit 2 was achieved on March 12, 1984. Full compliance for LaSalle Unit 1 is anticipated prior to startup following the first refueling outage presently scheduled to begin in November 1985.

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