

DMB
IE14

OCT 26 1984

Docket Nos. 50-373, 50-374
License Nos. NPF-11, NPF-18
EA 84-16

Commonwealth Edison Company
ATTN: Mr. James J. O'Connor
President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

This refers to the special safety inspection conducted by Mr. R. D. Lanksbury of the Region III staff during the period of November 8, 1983 through October 22, 1984 of activities at LaSalle County Station (LaSalle), Units 1 and 2, authorized by NRC Operating License Nos. NPF-11 and NPF-18. This inspection concerned the circumstances surrounding the failure of eight Unit 1 and two Unit 2 isolation valves to meet the NRC criterion set forth in NUREG-0737 and IE Bulletin 80-06 that resetting of a primary containment isolation signal, or an engineered safety feature (ESF) actuation signal, would not cause equipment to change position and thereby remove containment isolation, and the failure of Commonwealth Edison Company (CECo) to inform the NRC of this condition. The results of this inspection were discussed on February 28, 1984 during an Enforcement Conference held in the NRC Region III office between Mr. C. Reed and other members of your staff and Mr. A. B. Davis and other members of the Region III staff.

In 1983, while responding to NRC inquiries on the status of testing to demonstrate conformance to the NRC criterion set out above, CECO identified eight Unit 1 and two Unit 2 isolation valves that would reposition upon reset of an ESF actuation signal. These valves were not identified in submittals made to the NRC in 1981 in response to NUREG-0737 and Final Safety Analysis Report (FSAR) Question 031.285 (which implemented IE Bulletin 80-06 for LaSalle). CECO's December 8, 1981 response provided the final results of its review and identified 55 valves that would reposition upon resetting of an engineering safety feature actuation signal. CECO indicated that with the exception of two check valves, the systems design had been modified to satisfy the NRC criteria.

The NRC staff, after discovery of this finding, submitted two additional requests for information to your staff. This information was provided in letters dated November 15 and 28, 1983. Based on its review of these responses, the NRC staff concluded that six of the eight Unit 1 valves require modification to their control logic, which must be accomplished prior to startup after the first refueling outage, and that the two Unit 2 valves require modification to their control logic, which must be accomplished prior to exceeding 5 percent power.

8411160128 841026
PDR ADDCK 05000373 PDR
Q

IE14
1/1

OCT 26 1984

The apparent cause of the failure to meet NRC requirements was reliance upon an engineering analysis and CECO's conclusions as to what valves were included in the scope of NUREG-0737 and IE Bulletin 80-06. CECO concluded that since these valves do not receive an ESF signal, they were not within the scope of NUREG-0737 and, therefore, did not require any modification, nor were they required to be reported to the NRC. This was an incorrect conclusion because these valves do receive an ESF signal (primary containment isolation signal). This incorrect conclusion resulted in the submittal of false information to the NRC.

The violation in the enclosed Notice has been categorized as a Severity Level IV violation as described in the General Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C.

You are required to respond to the enclosed Notice of Violation and should follow the instructions in the Notice when preparing your response. Your written reply to this letter and the results of future inspections will be considered in determining whether further enforcement action is warranted.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure(s) will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosure(s), and your response to this letter will be placed in the Public Document Room.

The response directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original signed by
James G. Keppler
James G. Keppler
Regional Administrator

Enclosures:

1. Notice of Violation
2. Inspection Report
No. 50-373/83-52(DRS) and
No. 50-374/83-55(DRS)

Distribution

PDR
 NSIC
 LPDR
 ACRS
 SECY
 CA
 RCDeYoung, IE
 JMTaylor, IE
 JA Axelrad, IE
 GKlingler, IE
 JLieberman, ELD
 VStello, DED/ROGR
 FIngram, PA
 JGKeppler, RIII
 Enforcement Coordinators
 RI, RII, RIII, RIV, RV
 GMessenger, OIA
 BHayes, OI
 HDenton, NRR
 MWilliams, NRR
 JCrooks, AEOD
 ELJordan, IE
 JNGrace, IE
 Resident Inspector, LaSalle
 IE:EA File
 IE:ES File
 EDO Rdg File
 DCS

Karen Borgstadt
 Office of Assistant Attorney General
 500 S. Second Street
 Springfield, IL 62701

RIII
 Walker/sv
 10/24/84

RIII
 Spessard
 10/25/84

RIII
 Schultz
 10-25-84

RIII
 Davis

RIII
 Keppler
 10/25/84