

NOTICE OF VIOLATION

Commonwealth Edison Company  
LaSalle County Station, Units 1 and 2

Docket Nos. 50-373, 50-374  
Licenses No. NPF-11, NPF-18  
EA 84-16

A special safety inspection conducted at LaSalle County Station Units 1 and 2 during the period November 8, 1983 through February 21, 1984 confirmed that eight Unit 1 and two Unit 2 valves did not conform to NRC criteria as 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, respectively, 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.

In its letter of October 31, 1980 that transmitted NUREG-0737, the NRC Staff requested that CECO review containment protection system design to determine the degree of conformance to the criterion that the resetting of the ESF actuation signal would not cause containment isolation valves to change position thereby removing containment isolation, and identify any corrective actions to be implemented. Additionally, CECO was requested to provide justification for design departures for which no corrective action was planned. CECO stated in submittals dated January 29, May 19, and December 8, 1981, that all Unit 1 and 2 valves had been checked to determine whether they would revert to their normal position upon reset of an engineered safety feature actuation signal. CECO's December 8, 1981 response provided the final results of its review of valves in response to NUREG-0737 and identified 55 valves that would reposition upon resetting of an engineered safety feature actuation signal.

The licensee's submittals to the NRC concerning containment isolation dependability failed to identify eight Unit 1 and two Unit 2 valves which did not satisfy the NRC criterion. The apparent cause of these failures was reliance upon an engineering analysis and incorrect conclusions as to what valves were included in the scope of NUREG-0737. Commonwealth Edison Company erroneously 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.

As a result of this special inspection and in accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violation was identified.

10 CFR Part 50, Appendix B, Criterion III, as implemented by Commonwealth Edison Company 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.

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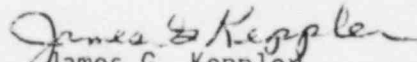
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Contrary to the above, CECO failed to assure that the LaSalle containment isolation valves conformed to design requirements in the LaSalle Final Safety Analysis Report (FSAR) Amendment L, Section L.29 and in CECO's response to FSAR question 031.285 (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.

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

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit to the Director, Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, IL 60137, within 30 days of the date of this Notice, a written statement or explanation, including for the alleged violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation, if admitted; (3) the corrective steps that have been taken and the results achieved; (4) the corrective steps that will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

FOR THE NUCLEAR REGULATORY COMMISSION

  
James G. Keppler  
Regional Administrator

Date at Glen Ellyn, Illinois  
this 25<sup>th</sup> day of October 1984