



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

Dm13

May 16, 1985

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.
50-373/85-009 and 50-374/85-009
NRC Docket Nos. 50-373 and 50--374

Reference (a): W. D. Shafer letter to Cordell Reed
dated April 17, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. M. J. Jordan, J. Bjorgen, S. DuPont, and N. Choules on March 11, through April 8, 1985, 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

lm

Attachment

cc: NRC Resident Inspector - LSCS

0133K

8505210362 850516
PDR ADOCK 05000373
Q PDR

MAY 17 1985

|||
IEO1

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION

ITEM OF NONCOMPLIANCE

1. Technical Specification, Section 6.2, requires the licensee to have detailed written procedures for instrument operation which could have an effect on the safety of the facility.

Contrary to the above, on March 21, 1985, the failure to have an adequate procedure for system filling and venting prior to returning a replaced instrument to service resulted in a Unit 1 scram while valving in an Automatic Depressurization System (ADS) low level instrument.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The parties involved have been advised as to the error that led to the incident. A special operating order was issued (85-17) on March 26, 1985, that provides guidance concerning returning instruments to a normal in service status. This special operating order includes direction as to who operates which valves, and it provides a caution about back-filling the instrument loops. No additional errors of this nature have occurred.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Administrative procedures LAP-900-4 (Equipment Out of Service) and LAP-1600-2 (Conduct of Operations) are being revised to provide continuing guidance as described above. These procedure revisions are being tracked by AIR-373-200-85-67054 and should be in place by June 10, 1985.

Additionally, training is being provided to the operators (EA's) about this incident and proper procedures for instrument valve operations. Emphasis is placed on ensuring accurate communications with the Instrument Maintenance Department. This training is included in LOEARQ MOD 7-85 and will be completed on May 24, 1985.

DATE OF FULL COMPLIANCE

Full compliance will be achieved when the procedure revisions are in place. This will occur by June 10, 1985.

ITEM OF NONCOMPLIANCE

2. Technical Specification, Section 6.2, requires the licensee to adhere to detailed written procedures for instrument operations that can have an effect on the safety of the facility.

Contrary to the above, the inspector noted two examples of failure to adhere to procedures:

- a. On March 31, 1985 while performing a surveillance on a Residual Heat Removal (RHR) System integrity monitor switch, an Instrument Mechanic incorrectly isolated the Unit 2 Shutdown Cooling System high flow isolation switch which caused an unnecessary isolation of the Shutdown Coolant System.
- b. On March 27, 1985 while performing a system pressure test on a Unit 1 Emergency Core Cooling System (ECCS) Division I low reactor level actuation switch, three Automatic Depressurization System (ADS) valves (B, J, and S) lifted.

The procedure required the pressure test to be performed at 1046 psig. The piping, however, was pressurized to approximately 1120 psig which caused the ADS valves to open.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- a. Shutdown cooling was restored with no problems.
- b. The outage boundary was re-verified and the hydro was successfully completed that day.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

- a. The technician was counseled about paying attention to what he is doing when he is working in the field.
- b. The station construction department onsite is developing a construction test procedure to further delineate the steps necessary to successfully complete post modification/maintenance pressure tests.

DATE OF FULL COMPLIANCE

- a. Full compliance has been achieved.
- b. Immediate corrective action as described above was completed March 27, 1985. Full implementation and use of the new construction pressure test procedure will be by June 15, 1985.