

February 13, 1997

EA 97-021

Mr. W. T. Subalusky, Jr.
Site Vice President
LaSalle County Station
Commonwealth Edison Company
2601 North 21st Road
Marseilles, IL 61341

SUBJECT: NRC INSPECTION REPORT NOS. 50-373/96018 & 50-374/96018 AND
NOTICE OF VIOLATION

Dear Mr. Subalusky:

On December 13, 1996, the NRC completed an inspection at your LaSalle facility. The enclosed report presents the results of that inspection.

During this inspection period, four apparent violations of NRC requirements were identified which are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. Three of the apparent violations pertain to the failure to ensure through appropriate testing that the control room and auxiliary electric equipment room ventilation systems could perform their design function during accident conditions. We are particularly concerned with the lack of understanding of the plant's design and licensing basis reflected in these apparent violations.

The fourth apparent violation involves the failure to identify and/or correct significant conditions adverse to quality. Specifically, your staff did not appropriately address degradation of safety-related electrical control switches due to hydrocarbon exposure and excessive age; did not identify the presence of foreign material in the Unit 2 suppression pool, which could have caused a common-mode failure of the emergency core cooling system, during an inspection of the pool in March 1996; and failed to implement timely corrective actions for an inoperable breaker event in April 1995, resulting in a similar event in October 1996 with two safety-related motor control center supply breakers. These three examples are of particular concern because they represent potential common-mode failures which could have simultaneously affected multiple safety systems. A fourth example of the failure to implement appropriate corrective action, which involved a reactor core isolation cooling system rupture disk event, was discussed in NRC Inspection Report No. 50-373/96013; 50-374/96013 transmitted to you by letter dated January 29, 1997.

A Notice of Violation is presently not being issued for these inspection findings. However, we request that you respond within 30 days of the date of this letter to the apparent violations discussed in the enclosed Inspection Report and to the apparent violation

discussed in Inspection Report No. 50-373/96013; 50-374/96013. Your response should be clearly marked as a "Response to Apparent Violations in Inspection Report Nos. 50-373/96013; 50-374/96013 and 50-373/96018; 50-373/96018" and should include for each apparent violation: (1) the reason for the apparent violation, or, if contested, the basis for disputing the apparent violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response should be submitted under oath or affirmation and may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response.

We intend to review your response to the apparent violations described in the enclosed inspection report in conjunction with: (1) your response dated January 10, 1997, to our letter dated November 15, 1996, which discussed the four apparent violations identified during our Service Water System Operational Performance Inspection, (2) your response to our letter dated January 24, 1997, regarding the proposed imposition of a \$650,000 civil penalty, and (3) your response to our letter dated January 27, 1997, requesting information pursuant to 10 CFR 50.54(f). Based on the results of this review, we will contact you to discuss whether a pre-decisional enforcement conference is necessary to enable the NRC to make an enforcement decision. You will also be given the opportunity to request an enforcement conference at that time. Please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter.

In addition to the apparent violations referenced above, certain other activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation is of concern because it involves an operator's failure to comply with procedure usage requirements while testing safety-related equipment.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practices," a copy of this letter, its enclosure, and your responses will be placed in the NRC Public Document Room (PDR).

Sincerely,

/s/ M. N. Leach
Melvyn N. Leach, Acting Deputy Director
Division of Reactor Safety

Docket Nos. 50-373; 50-374
License Nos. NPF-11; NPF-18

Enclosures: 1. Notice of Violation
2. Inspection Report 50-373/96018; 50-374/96018

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