



**Commonwealth Edison**

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Doc

June 22, 1988

Mr. A. Bert Davis  
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.  
50-373/88011 and 50-374/88010  
NRC Docket Nos. 50-373 and 50-374

Reference (a): Letter dated May 25, 1988 from W.L. Forney  
to Cordell Reed.

Dear Mr. Davis:

This letter is in response to the inspection conducted by Mr. R. A. Kopriva on March 25 through May 9, 1988 of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company (CECo) response to the one Level IV Notice of Violation is provided in the Attachment.

CECo appreciates the comment in the inspection summary regarding problems identified in the previous inspection report period "...which appear to have been isolated occurrences..." We continue to strive to maintain our work conduct at LaSalle error free and will remain diligent in our efforts to control work activities.

If you have any further questions regarding this matter, please contact this office.

Very truly yours,

H. E. Bliss  
Nuclear Licensing Manager

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Attachment

cc: NRC Resident Inspector - LSCS

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## ATTACHMENT

VIOLATION: IR 374/88010-01

Technical Specification 6.2.A requires that detailed written procedures including applicable checkoff lists shall be prepared, approved, and adhered to; including those procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1987, and surveillance and testing requirements. Regulatory Guide 1.33 includes procedures for control of measuring and test equipment and for surveillance tests, procedures and calibrations.

Contrary to the above, on March 9, 1988, while performing surveillance LIS-NB-404, "Unit 2 Reactor Vessel Low Low Water Level RCIC Initiation, Low-Low-Low Water Level LPCS/RHR Initiation, and ADS Permissive Functional Test," the procedure was not adhered to when an instrument technician inadvertently valved in the variable and reference legs of a switch being tested with the equalizing valve open. Subsequent actions to correct the problem lead to recirculation pump trip, reactor core power oscillations and reactor scram.

### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Immediately after the event occurred, an investigation regarding the valving error was conducted. As a result of this investigation, it was recommended that the event should be reviewed by all Instrument Maintenance Personnel. During this review, the importance of proper valving operations was stressed, including the potential for hydraulic interaction as a result of a valving error. The Instrument Maintenance personnel involved in the event have been counseled.

### CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

The Instrument Maintenance Department continues to stress the importance of attention to detail when performing plant evolutions. Valving manipulations are covered in the Instrument Maintenance Initial Training program, which discusses valving manipulations and the effect that these valving manipulations could have upon the plant. The Training Department is presently developing a similar training module which will be added to the continuing training program for "A" Instrument Technicians and Control System Technicians.

In addition, LaSalle is pursuing ways to reduce the number of valving operations performed by technicians in the field. These methods include: 1) Participating in the owner's group activities directed toward reducing the

frequency of surveillance testing from monthly to quarterly; and 2) Pursuing modifications to remove SOR differential pressure switches from most applications, so as to eliminate the accelerated testing program which was implemented to monitor SOR performance. The SOR switches are being replaced by analog devices which require no inplant valving manipulations during plant operations.

DATE OF FULL COMPLIANCE

LaSalle is currently in full compliance. This event has been reviewed by Instrument Maintenance personnel. The addition to the continuing training program is currently scheduled to be completed by December 16, 1988.