

NOTICE OF VIOLATION

Commonwealth Edison Company
LaSalle County Station
Units 1 and 2

Dockets No. 50-373, 50-374
Licenses No. NPF-11, NPF-18

During an NRC inspection conducted on March 22 through May 9, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

Technical Specification 6.2.A.a requires that applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established, implemented, and maintained.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, specifies procedures for the shutdown cooling system, procedure adherence and temporary change method, and contamination control.

LaSalle Operating Procedure LOP-RH-07, "Shutdown Cooling System Startup, Operation, and Transfer," Revision 38, Step F.6, requires the Nuclear Station Operator (NSO) to notify the Radiation Protection department that shutdown cooling is operating and to record the notifications, and names of persons notified in the Unit Log, after starting a train of shutdown cooling following realignment of the system.

LaSalle Administrative Procedure LAP-100-40, "Procedure Use and Adherence Expectations," Revision 9. Section B.3, requires procedure users to perform each step of continuous use procedures in the sequence specified. Section B.2 of LAP-100-40 requires that procedure users stop if the procedure cannot be performed as written or the procedure is incorrect, and have the procedure revised.

LaSalle Radiation Protection Procedure LRP-5721-6, "Construction of Radiologically Posted Areas and Step Off Pads Areas," Revision 1, Step F.2.f, requires that if a contamination area is constructed over a floor grating, then plastic or cloth that can be washed is to be installed on the grating to prevent the spread of contamination from the contaminated area to the non-contaminated area below.

Contrary to the above, applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, were not correctly implemented in the following instances:

- a. The inspectors identified that on March 29, 1997, the NSO did not notify Radiation Protection department personnel that the B train of the residual heat removal system had been started in the shutdown cooling mode of operation after the system was realigned.

- b. On April 1, 1997, electricians performing LaSalle Electrical Surveillance LES-RH-100, "Unit 1 Residual Heat Removal System Division 1 Relay Logic Functional Test," a continuous use procedure, did not perform the steps in the specified sequence or have the procedure revised to reflect the sequence followed.
- c. On April 11 and 24, 1997, the inspectors identified that contamination areas were established for maintenance activities associated with the 2A moisture separator reheater without covering the floor grating at the work area with plastic or cloth to prevent the spread of contamination from the established contamination area to a non-contaminated floor below.

This is a Severity Level IV violation (Supplement I) (50-373/97006-01; 50-374/97006-01).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the 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 may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in the Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of

withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois
this 28th day of July 1997