



Commonwealth Edison
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January 27, 1986

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.
50-373/85-036 and 50-374/85-037
NRC Docket Nos. 50-373 and 50-374

Reference (a): W. D. Shafer letter to Cordell Reed
dated December 13, 1985.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. R. A. Paul and D. E. Miller of your office conducted between October 30 and November 22, 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,

M.S. Turbak

M. S. Turbak
Operating Plant Licensing Director

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Attachment

cc: NRC Resident Inspector - LSCS

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ATTACHMENT A

ITEM OF NONCOMPLIANCE

Technical Specification 6.2.B requires that radiation control procedures be maintained, made available to all personnel, and adhered to.

LaSalle Radiation Protection Procedure LRP-1120-2 requires that immediately before entering a high radiation area, the person entering must call the Operating Shift Supervisor (OSS) or his designated alternate to inform him of the entry and appropriate duration. The procedure also requires that immediately after departing a high radiation area, the persons departing must call the OSS or his designated alternate to inform him that a safe exit has been made.

Contrary to the above, calls are not routinely made to inform the OSS or his designated alternate that a high radiation area entry will be made and to inform of a safe exit.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

LaSalle agrees that the calls specified in the procedure were not routinely performed. A review of the requirements delineated in LaSalle Radiation Protection Procedure LRP 1120-2 was performed. The specific requirements delineated in Step F.1.f. and F.1.g., 1) requiring that personnel call the Operating Shift Supervisor or his designated alternate immediately prior to entering a high radiation area to inform him of the entry and approximate duration, and 2) requiring that personnel call the Operating Shift Supervisor or his designated alternate immediately after departing a high radiation area to inform him that a safe exit has been made, were evaluated. This evaluation determined that based on the following, these calls to the Operating Shift Supervisor were not required:

1. LaSalle Administrative Procedure LAP 900-20, "Control and Entry of Confined spaces," controls entries into confined spaces.
2. Most high radiation area entries are made by two or more individuals.
3. Individuals requiring entry into a high radiation area alone are reminded that they should call the Operating Shift Supervisor for their own personal protection.
4. In accordance with LaSalle Radiation Protection Procedure LRP 1120-2, the OSS or his designated alternate is called for initial authorization for each entry into high radiation areas and is therefore knowledgeable that personnel may be in the area.

5. In accordance with LaSalle Radiation Protection Procedure LRP 1120-2, the Radiation Chemistry department maintains a log of personnel obtaining high radiation area access keys and/or keycards and the location of the high radiation area(s) to be accessed. From this log, Radiation Chemistry personnel can determine which people may be in high radiation areas at any specific time.
6. In accordance with LaSalle Radiation Protection Procedure LRP 1120-2, all personnel entering a high radiation area shall:
 - a. Read, understand and sign the appropriate Type 2 radiation work permit; and
 - b. Be accompanied by or be provided with one or more of the following:
 - 1) A radiation dose rate monitoring device;
 - 2) A radiation dose integrating device which alarms at a preset value;
 - 3) A Radiation Chemistry Technician with a radiation dose rate monitoring device responsible for providing positive control over the activities in the area.
7. In accordance with LaSalle Radiation Protection Procedure LRP 1120-2, upon return of a high radiation area access key or keycard, the Radiation Chemistry personnel log the time that the return is made and the individuals have exited the high radiation area(s).
8. Normally, the oncoming Shift Radiation Chemistry Technician, responsible for the radiation protection activities of that Shift, reviews the high radiation area access log to determine the status of the high radiation area access keys and keycards. Depending on knowledge of the work being performed, the Radiation Chemistry Technician or his foreman may inquire of the work group supervisor or the OSS as to the status of the outstanding access key card and individual(s) involved.
9. The high number of calls generated by these requirements (and subsequent logging of calls) would be detrimental to the Operating Shift Supervisor's responsibility for operation of the plant.

In light of this evaluation, LRP 1120-2 was revised on November 18, 1985 to perform the following:

1. Remove any requirements for routine calls to the OSS or his alternate for informational purposes; and
2. Require the individual who is responsible for the high radiation area access key or keycard to sign the log upon return of the key or keycard.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Additional corrective actions taken or intended to be taken to improve high radiation area access controls were delineated to you within the LaSalle Station Proactive Management Plan incorporated in the response to the Nuclear Regulatory Commission's request for information under 10 CFR 50.54(f) dated December 23, 1985.

DATE OF FULL COMPLIANCE

Full compliance concerning this noncompliance was achieved on November 18, 1985.