



Commonwealth Edison
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March 26, 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.
50-373/86-003 and 50-374/86-003
NRC Docket Nos. 50-373 and 50-374

Reference (a): C. E. Norelius letter to Cordell Reed
dated February 26, 1986

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. M. Jordan, J. Bjorgen, R. Kopriva, S. Stasek, A. Morrongiello, W. Guldmond and Ms. E. Hare on January 1 through February 12, 1986, of activities at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. The Commonwealth Edison Company's response to the Notice of Violation is provided in the enclosure.

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

Very truly yours,

Michael 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.A states, in part, "Detailed written procedures, including applicable checkoff lists covering items listed below, shall be prepared, approved and adhered to:

- Item 6: Preventative and corrective maintenance operations which could have an effect on the safety of the facility."

In accomplishing corrective maintenance, the licensee's Equipment Out-of-Service Procedure LAP 900-4, Revision 23, Section E.3 states, in part, "If the equipment being removed from service is safety related, review applicable Technical Specifications for limiting conditions for operations, required surveillance, time limits,"

Contrary to the above, on January 21, 1986 the Unit 2 High Pressure Core Spray (HPCI) minimum flow valve was taken out of service in the open position and all applicable Technical Specifications pertaining to this valve were not considered. The licensee addressed Technical Specification 3.5.1, Emergency Core Cooling System (ECCS) operability but neglected Technical Specification 3.6.3, Primary Containment Isolation Valves, which has a more restrictive Limiting Condition for Operation (LCO).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

As noted in the inspection report, the valve was placed in its required position at 0850 on January 21, 1986, the day of the occurrence.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

This event was discussed with the shift crew that took the valve out of service improperly, and the mistakes made in not fully considering all the design requirements the valve fulfills were emphasized.

The Equipment Out-of-Service procedure, LAP 900-4 was revised to emphasize the need to ensure that all relevant Technical Specification requirements are addressed when removing equipment from service.

The Assistant Superintendent operations discussed this event with the other Shift Engineers, emphasizing the mistakes made and lessons learned.

The General Office-Nuclear Stations Division has reviewed this event and will issue a memorandum to the other stations describing the circumstances and the potential problems associated with removing ECCS pump minimum flow valves from service for maintenance.

DATE OF FULL COMPLIANCE

LaSalle County Station full compliance has been achieved.

The General Office corrective action will be completed by April 15, 1986.

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