UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

~~RIII file~~
DMB

AUG 15 1986

Docket No. 50-373
Docket No. 50-374

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Vice President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

The NRC's Office for Analysis and Evaluation of Operational Data (AEOD) has recently completed an assessment of your Licensee Event Reports (LERs) from LaSalle 1 and 2 as part of the NRC's Systematic Assessment of Licensee Performance (SALP). We are providing you a copy of AEOD's assessment prior to the issuance of the SALP 6 Board Report so that you might be aware of their findings and to also provide you a basis by which future submittals should be patterned.

In general, the reports for this period were found to be above average and of very high quality. This is a significant improvement over the last period in which the reports were considered average.

The evaluation of the content and quality of a representative sample of LERs submitted by LaSalle 1 and 2 from October 1, 1985 to the present was performed using a refinement of the basic methodology presented in NUREG/CR-4178. This is the second time that the LaSalle LERs have been evaluated using this methodology. The results of this evaluation indicate that the LaSalle 1 and 2 LERs now have an overall average score of 8.9 out of a possible 10 points, compared to their previous overall average score of 8.0 and a current industry average of 7.9.

One weakness that still remains in the LaSalle LERs, in terms of their description of safety significance, involves the requirement to provide the manufacturer and model number (or other appropriate identification) for those components that fail or whose design contributes to the event. The failure to provide information concerning the identification of failed components prompts concerns that others in the industry may not obtain information that might enable them to identify and correct generic problems prior to having a similar failure at their facility.

A strong point of the LaSalle LERs is that information concerning root cause,

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safety assessment, and the mode, mechanism, and effect of the failed component was well written for the LERs that were evaluated.

The basis for these findings can be found in the enclosed document.

Sincerely,

Charles E. Norelius, Director
Division of Reactor Projects

Enclosure: AEOD Assessment

cc w/enclosure:
D. L. Farrar, Director
of Nuc[illegible] Licensing
C. J. Diederich, Plant
Manager
DCS/RSB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Phyllis Dunton, Attorney
General's Office, Environmental
Control Division

YES YES

RIII	RIII	RIII	RIII	RIII	RIII
JAB	ERS				
Bauer/qg	Schweibinz	Weibe	Wright	Guldemond	Norelius
8/7/86	8-14-86	8/14/86	8/14/86	8/14/86	8/14/86

AEOD INPUT TO SALP REVIEW FOR LASALLE 1 AND 2

Introduction

In order to evaluate the overall quality of the contents of the Licensee Event Reports (LERs) submitted by LaSalle 1 and 2 during the October 1, 1985 to August 31, 1986 Systematic Assessment of Licensee Performance (SALP) assessment period, a representative sample of the station's LERs was evaluated using a refinement of the basic methodology presented in NUREG/CR-4178.[1] The sample consists of a total of 10 LERs (i.e., 6 LERs for LaSalle 1 and 4 for LaSalle 2), which is 60% of the LERs on file at the time the sample was selected. The LaSalle LERs were evaluated as one sample for this SALP period because it was determined that their LERs are both written and formally reviewed at the station, rather than unit, level. See Appendix A for a list of the LER numbers in the sample.

It was necessary to start the evaluation before the end of the SALP assessment period because the input was due such a short time after the end of the SALP period. Therefore, all of the LERs prepared during the SALP assessment period were not available for review.

Methodology

The evaluation consists of a detailed review of each selected LER to determine how well the content of its text, abstract, and coded fields meet the requirements of NUREG-1022[2], and Supplements 1[3] and 2[4] to NUREG-1022.

The evaluation process for each LER is divided into two parts. The first part of the evaluation consists of documenting comments specific to the content and presentation of each LER. The second part consists of determining a score (0-10 points) for the text, abstract, and coded fields of each LER.

The LER specific comments serve two purposes: (1) they point out what the analysts considered to be the specific deficiencies or observations concerning the information pertaining to the event, and (2) they provide a basis for a count of general deficiencies for the overall sample of LERs that was reviewed. Likewise, the scores serve two purposes: (1) they serve to illustrate in numerical terms how the analysts perceived the content of the information that was presented, and (2) they provide a basis for determining an overall score for each LER. The overall score for each LER is the result of combining the scores for the text, abstract, and coded fields (i.e., 0.6 x text score + 0.3 x abstract score + 0.1 x coded fields score = overall LER score).

The results of the LER quality evaluation are divided into two categories: (1) detailed information and (2) summary information. The detailed information, presented in Appendices A through D, consists of LER sample information (Appendix A), a table of the scores for each sample LER (Appendix B), tables of the number of deficiencies and observations for the text, abstract and coded fields (Appendix C), and comment sheets containing narrative statements concerning the contents of each LER (Appendix D). When referring to these appendices, the reader is cautioned not to try to directly correlate the number of comments on a comment sheet with the LER scores, as the analysts has flexibility to consider the magnitude of a deficiency when assigning scores.

Discussion of Results

A discussion of the analysts' conclusions concerning LER quality is presented below. These conclusions are based solely on the results of the evaluation of the contents of the LERs selected for review and as such represent the analysts' assessment of the station's performance (on a scale of 0 to 10) in submitting LERs that meet the requirements of 10 CFR 50.73(b). Again, LaSalle LERs were evaluated as one sample, rather than two separate samples (by unit), because it was determined that the LaSalle LERs are both written and formally reviewed at the station, rather than the unit, level.

Table 1 presents the average scores for the sample of LERs evaluated for the station. The reader is cautioned that the scores resulting from the methodology used for this evaluation are not directly comparable to the scores contained in NUREG/CR-4178 due to refinements in the methodology. In order to place the scores provided in Table 1 in perspective, the distribution of the overall average score for all licensees that have been evaluated using the current methodology is provided on Figure 1. Additional scores are added to Figure 1 each month as other licensees are evaluated. Table 2 and Appendix Table B-1 provide a summary of the information that is the basis for the average scores in Table 1. For example, LaSalle's average score for the text of the LERs that were evaluated is 8.8 out of a possible 10 points. From Table 2 it can be seen that the text score actually results from the review and evaluation of 17 different requirements ranging from the discussion of plant operating conditions before the event [10 CFR 50.73(b)(2)(ii)(A)] to text presentation. The percentage scores in the text summary section of Table 2 provide an indication of how well each text requirement was addressed by the station for the 10 LERs that were evaluated.

Discussion of Specific Deficiencies

A review of the percentage scores presented in Table 2 will quickly point out where the station is experiencing the most difficulty in preparing LERs. For example, requirement percentage scores of less than 75 indicate that the station probably needs additional guidance concerning these requirements. Scores of 75 or above, but less than 100, indicate that the station probably understands the basic requirement but has either: (1) excluded certain less significant information from most of the discussion concerning that requirement or (2) totally failed to address the requirement in one or two of the selected LERs. The station should review the LER specific comments presented in Appendix D in order to determine why it received less than a perfect score for certain requirements. The text requirements with a score of less than 75 are discussed below in their order of importance. In addition, the primary deficiencies in the abstract and coded fields are discussed.

TABLE 1. SUMMARY OF SCORES[a] FOR LASALLE 1 AND 2

	Average	High	Low
Text	8.8	9.5	7.6
Abstract	9.0	10.0	7.6
Coded Fields	9.0	9.8	8.5
Overall	8.9	9.3	8.0

a. See Appendix B for a summary of scores for each LER that was evaluated.

Figure 1. Distribution of overall average LER scores

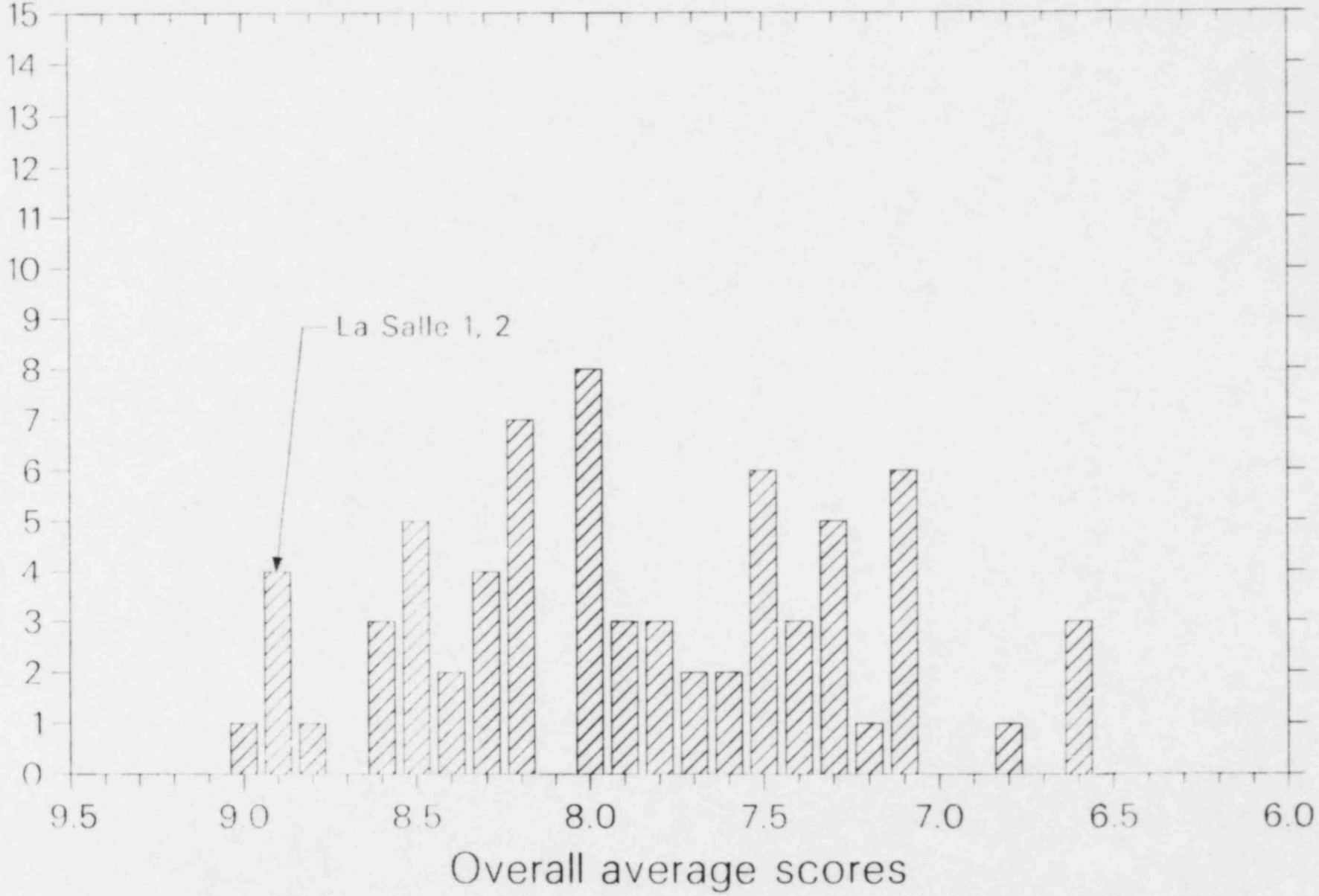

TABLE 2. LER REQUIREMENT PERCENTAGE SCORES FOR LASALLE 1 AND 2

TEXT

Requirements [50.73(b)] - Descriptions	Percentage Scores ( )[a]
(2)(ii)(A) - - Plant condition prior to event	100 (10)
(2)(ii)(B) - - Inoperable equipment that contributed	[b]
(2)(ii)(C) - - Date(s) and approximate times	97 (10)
(2)(ii)(D) - - Root cause and intermediate cause(s)	96 (10)
(2)(ii)(E) - - Mode, mechanism, and effect	96 (6)
(2)(ii)(F) - - EIIS Codes	60 (10)
(2)(ii)(G) - - Secondary function affected	[b]
(2)(ii)(H) - - Estimate of unavailability	80 (5)
(2)(ii)(I) - - Method of discovery	80 (10)
(2)(ii)(J)(1) - Operator actions affecting course	100 (2)
(2)(ii)(J)(2) - Personnel error (procedural deficiency)	81 (4)
(2)(ii)(K) - - Safety system responses	100 (3)
(2)(ii)(L) - - Manufacturer and model no. information	50 (6)
(3) - - - - - Assessment of safety consequences	90 (10)
(4) - - - - - Corrective actions	84 (10)
(5) - - - - - Previous similar event information	100 (10)
(2)(i) - - - - Text presentation	86 (10)

ABSTRACT

Requirements [50.73(b)(1)] - Descriptions	Percentage Scores ( )[a]
- Major occurrences (Immediate cause and effect information)	92 (10)
- Description of plant, system, component, and/or personnel responses	100 (3)
- Root cause information	92 (10)
- Corrective Action information	91 (10)
- Abstract presentation	81 (10)

TABLE 2. (continued)

CODED FIELDS

Item Number(s) - Description	Percentage Scores ( )[a]
1, 2, and 3 - Facility name (unit no.), docket no. and page number(s)	100 (10)
4 - - - - - - Title	73 (10)
5, 6, and 7 - Event date, LER No., and report date	99 (10)
8 - - - - - - Other facilities involved	84 (10)
9 and 10 - - Operating mode and power level	100 (10)
11 - - - - - Reporting requirements	93 (10)
12 - - - - - Licensee contact information	88 (10)
13 - - - - - Coded component failure information	86 (10)
14 and 15 - - Supplemental report information	95 (10)

a. Percentage scores are the result of dividing the total points for a requirement by the number of points possible for that requirement. (Note: Some requirements are not applicable to all LERs; therefore, the number of points possible was adjusted accordingly.) The number in parenthesis is the number of LERs for which the requirement was considered applicable.

b. A percentage score for this requirement is meaningless as it is not possible to determine from the information available to the analyst whether this requirement is applicable to a specific LER. It is always given 100% if it is provided and is always considered "not applicable" when it is not.

The manufacturer and/or model number (or other identification) was not provided in the text of three of the six LERs that involved a component failure, Requirement 50.73(b)(2)(ii)(L). Components that fail or whose design contributes to the event should be identified in the text so that others in the industry can be made aware of possible generic problems. An event at one station can often lead to the identification of a generic problem that can be corrected at other plants or stations before they experience a similar event.

The Energy Industry Identification System component function identifier and system name codes were not consistently provided in the text. Three LERs partially provided these codes, and three LERs failed to provide them at all. The EIIS codes are required to be provided for each system and component referred to in the LER [Requirement 50.73(b)(2)(ii)(F)].

The main deficiency in the area of coded fields involves the title, Item (4). Seven of the titles failed to indicate root cause, and three failed to include the result. While the result is considered to be the most important part of the title, cause and link information must be included to make a title complete. An example of a title that only addresses the result might be "Reactor Scram". This is inadequate in that the cause and link are not provided. A more appropriate title might be "Inadvertent Relay Actuation During Surveillance Test LOP-1 Causes Reactor Scram". From this title the reader knows the cause involved either personnel or procedures and that testing linked the personnel/procedure error and the scram.

Another area of coded fields contained a minor deficiency; six of the ten LERs evaluated failed to include the Licensee Contact position title (Item 12, NRC Form 366).

Table 3 provides a summary of the areas that still requirement improvement for the LaSalle LERs. For additional and more specific information concerning deficiencies, the reader should refer to the

specific information presented in Appendix D. General guidance concerning these requirements can be found in NUREG-1022, Supplement No. 2.

It should be noted that this is the second time that the LaSalle LERs have been evaluated using this same methodology. The previous evaluation, which was reported in September of 1985, was performed on the unit, rather than the station, level; however, after averaging the individual units scores from the previous evaluation, a direct comparison of scores for both evaluations was made, see Table 4. As can be seen, LaSalle LERs have improved significantly since the previous evaluation and are now well above the current industry overall average of 7.9. (Note: The industry overall average is the result of averaging the current overall average scores for each unit/station that has been evaluated using this methodology.)

TABLE 3. AREAS MOST NEEDING IMPROVEMENT FOR LASALLE 1 AND 2 LERs

Areas	Comments
Failed component identification	Component identification information such as manufacturer and model number, must be included in the text for each component that fails or is suspected of contributing to the event because of its design.
EIIS codes	EIIS codes should be provided in the text for all systems and/or components discussed in the text.
Coded fields	
a. Titles	All titles should include the result of the event (i.e., why the event was reportable) as well as root cause information. The link between the cause and result should be provided when it is not readily apparent how the root cause led to the result.
b. Licensee contact	The position title of the Licensee Contact should be provided. See NUREG-1022, page 24, Item 12.

TABLE 4. COMPARISON OF LER SCORES FROM PREVIOUS EVALUATIONS

Report Date	September-85	August-85
Text average	8.0[a]	8.8
Abstract average	7.9[a]	9.0
Coded fields average	8.6[a]	9.0
Overall average	8.0[a]	8.9

a. These average scores are the result of weight averaging the September-85 scores for the two LaSalle units to produce a station average.

REFERENCES

1. B. S. Anderson, C. F. Miller, B. M. Valentine, An Evaluation of Selected Licensee Event Reports Prepared Pursuant to 10 CFR 50.73 (DRAFT), NUREG/CR-4178, March 1985.

2. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022, U.S. Nuclear Regulatory Commission, September 1983.

3. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 1, U.S. Nuclear Regulatory Commission, February 1984.

4. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 2, U.S. Nuclear Regulatory Commission, September 1985.

APPENDIX A

LER SAMPLE SELECTION INFORMATION FOR LASALLE 1 and 2

TABLE A-1. LER SAMPLE SELECTION FOR LASALLE 1 AND 2

Sample Number	Unit Number	LER Number	Comments
1	1	85-063-01	ESF
2	1	85-066-00	
3	1	85-069-00	
4	1	86-002-00	
5	1	86-003-00	
6	1	86-004-00	ESF
7	2	85-044-00	SCRAM
8	2	85-046-00	
9	2	85-047-00	
10	2	85-048-00	

APPENDIX B

EVALUATION SCORES OF
INDIVIDUAL LERs FOR LASALLE 1 and 2

TABLE B-1. EVALUATION SCORES OF INDIVIDUAL LERs FOR LASALLE 1 AND 2

	LER Sample Number[a]															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Text	9.0	8.9	8.6	8.2	9.3	8.7	9.1	9.5	7.6	8.9	--	--	--	--	--	--
Abstract	9.1	9.2	9.4	8.0	9.2	7.6	9.7	8.8	8.5	10.0	--	--	--	--	--	--
Coded Fields	8.6	9.2	8.8	8.5	9.4	9.8	9.0	9.0	8.6	9.0	--	--	--	--	--	--
Overall	9.0	9.0	8.8	8.1	9.3	8.5	9.3	9.2	8.0	9.3	--	--	--	--	--	--

	LER Sample Number[a]														
	17	18	19	20	21	22	23	24	25	26	27	28	29	30	AVERAGE
Text	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.8
Abstract	--	--	--	--	--	--	--	--	--	--	--	--	--	--	9.0
Coded Fields	--	--	--	--	--	--	--	--	--	--	--	--	--	--	9.0
Overall	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.9

a. See Appendix A for a list of the corresponding LER numbers.

APPENDIX C

DEFICIENCY AND OBSERVATION COUNTS FOR LASALLE 1 and 2

TABLE C-1. TEXT DEFICIENCIES AND OBSERVATIONS FOR LASALLE 1 AND 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
50.73(b)(2)(ii)(A)--Plant operating conditions before the event were not included or were inadequate.		0 (10)
50.73(b)(2)(ii)(B)--Discussion of the status of the structures, components, or systems that were inoperable at the start of the event and that contributed to the event was not included or was inadequate.		0 (3)
50.73(b)(2)(ii)(C)--Failure to include sufficient date and/or time information.		1 (10)
a. Date information was insufficient.	0	
b. Time information was insufficient.	1	
50.73(b)(2)(ii)(D)--The root cause and/or intermediate failure, system failure, or personnel error was not included or was inadequate.		2 (10)
a. Cause of component failure was not included or was inadequate	1	
b. Cause of system failure was not included or was inadequate	1	
c. Cause of personnel error was not included or was inadequate.	0	
50.73(b)(2)(ii)(E)--The failure mode, mechanism (immediate cause), and/or effect (consequence) for each failed component was not included or was inadequate.		1 (6)
a. Failure mode was not included or was inadequate	0	
b. Mechanism (immediate cause) was not included or was inadequate	0	
c. Effect (consequence) was not included or was inadequate.	1	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
50.73(b)(2)(11)(F)--The Energy Industry Identification System component function identifier for each component or system was not included.		6 (10)
50.73(b)(2)(11)(G)--For a failure of a component with multiple functions, a list of systems or secondary functions which were also affected was not included or was inadequate.		0 (0)
50.73(b)(2)(11)(H)--For a failure that rendered a train of a safety system inoperable, the estimate of elapsed time from the discovery of the failure until the train was returned to service was not included.		1 (5)
50.73(b)(2)(11)(I)--The method of discovery of each component failure, system failure, personnel error, or procedural error was not included or was inadequate.		2 (10)
a. Method of discovery for each component failure was not included or was inadequate	0	
b. Method of discovery for each system failure was not included or was inadequate	0	
c. Method of discovery for each personnel error was not included or was inadequate	2	
d. Method of discovery for each procedural error was not included or was inadequate.	0	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
50.73(b)(2)(ii)(J)(1)--Operator actions that affected the course of the event including operator errors and/or procedural deficiencies were not included or were inadequate.		0 (2)
50.73(b)(2)(ii)(J)(2)--The discussion of each personnel error was not included or was inadequate.		3 (4)
a. OBSERVATION: A personnel error was implied by the text, but was not explicitly stated.	1	
b. 50.73(b)(2)(ii)(J)(2)(i)--Discussion as to whether the personnel error was cognitive or procedural was not included or was inadequate.	2	
c. 50.73(b)(2)(ii)(J)(2)(ii)--Discussion as to whether the personnel error was contrary to an approved procedure, was a direct result of an error in an approved procedure, or was associated with an activity or task that was not covered by an approved procedure was not included or was inadequate.	0	
d. 50.73(b)(2)(ii)(J)(2)(iii)--Discussion of any unusual characteristics of the work location (e.g., heat, noise) that directly contributed to the personnel error was not included or was inadequate.	0	
e. 50.73(b)(2)(ii)(J)(2)(iv)--Discussion of the type of personnel involved (i.e., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) was not included or was inadequate.	0	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
50.73(b)(2)(ii)(K)--Automatic and/or manual safety system responses were not included or were inadequate.		0 (3)
50.73(b)(2)(ii)(L)--The manufacturer and/or model number of each failed component was not included or was inadequate.		3 (6)
50.73(b)(3)--An assessment of the safety consequences and implications of the event was not included or was inadequate.		3 (10)
a. OBSERVATION: The availability of other systems or components capable of mitigating the consequences of the event was not discussed. If no other systems or components were available, the text should state that none existed.		
b. OBSERVATION: The consequences of the event had it occurred under more severe conditions were not discussed. If the event occurred under what were considered the most severe conditions, the text should so state.		
50.73(b)(4)--A discussion of any corrective actions planned as a result of the event including those to reduce the probability of similar events occurring in the future was not included or was inadequate.		6 (10)

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
a. A discussion of actions required to correct the problem (e.g., return the component or system to an operational condition or correct the personnel error) was not included or was inadequate.	1	
b. A discussion of actions required to reduce the probability of recurrence of the problem or similar event (correct the root cause) was not included or was inadequate.	4	
c. OBSERVATION: A discussion of actions required to prevent similar failures in similar and/or other systems (e.g., correct the faulty part in all components with the same manufacturer and model number) was not included or was inadequate.	1	
50.73(b)(5)--Information concerning previous similar events was not included or was inadequate.		0 (10)

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
50.73(b)(2)(i)--Text presentation inadequacies.		3 (10)
a. OBSERVATION: A diagram would have aided in understanding the text discussion.	0	
b. Text contained undefined acronyms and/or plant specific designators.	2	
c. The text contains other specific deficiencies relating to the readability.	3	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which the requirement was considered applicable.

TABLE C-2. ABSTRACT DEFICIENCIES AND OBSERVATIONS FOR LASALLE 1 AND 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
A summary of occurrences (immediate cause and effect) was not included or was inadequate		4 (10)
A summary of plant, system, and/or personnel responses was not included or was inadequate. a. Summary of plant responses was not included or was inadequate. b. Summary of system responses was not included or was inadequate. c. Summary of personnel responses was not included or was inadequate.		0 (3)
A summary of the root cause of the event was not included or was inadequate.		3 (10)
A summary of the corrective actions taken or planned as a result of the event was not included or was inadequate.		3 (10)

TABLE C-2. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
Abstract presentation inadequacies		4 (10)
a. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text, therefore, the text should discuss all information summarized in the abstract.	2	
b. The abstract was greater than 1400 characters	0	
c. The abstract contains undefined acronyms and/or plant specific designators.	0	
d. The abstract contains other specific deficiencies (i.e., poor summarization, contradictions, etc.)	2	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more deficiency or observation. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

TABLE C-3. CODED FIELDS DEFICIENCIES AND OBSERVATIONS FOR LASALLE 1 AND 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
Facility Name		0 (10)
a. Unit number was not included or incorrect.		
b. Name was not included or was incorrect.		
c. Additional unit numbers were included but not required.		
Docket Number was not included or was incorrect.		0 (10)
Page Number was not included or was incorrect.		0 (10)
Title was left blank or was inadequate		9 (10)
a. Root cause was not given in title	7	
b. Result (effect) was not given in title	3	
c. Link was not given in title	0	
Event Date		0 (10)
a. Date not included or was incorrect.		
b. Discovery date given instead of event date.		
LER Number was not included or was incorrect		0 (10)
Report Date		1 (10)
a. Date not included	0	
b. OBSERVATION: Report date was not within thirty days of event date (or discovery date if appropriate).	1	
Other Facilities information in field is inconsistent with text and/or abstract.		3 (10)
Operating Mode was not included or was inconsistent with text or abstract.		0 (10)

TABLE C-3. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
Power level was not included or was inconsistent with text or abstract		0 (10)
Reporting Requirements		2 (10)
a. The reason for checking the "OTHER" requirement was not specified in the abstract and/or text.	0	
b. OBSERVATION: It may have been more appropriate to report the event under a different paragraph.	0	
c. OBSERVATION: It may have been appropriate to report this event under an additional unchecked paragraph.	2	
Licensee Contact		6 (10)
a. Field left blank	0	
b. Position title was not included	6	
c. Name was not included	0	
d. Phone number was not included.	0	
Coded Component Failure Information		7 (10)
a. One or more component failure sub-fields were left blank.	1	
b. Cause, system, and/or component code is inconsistent with text.	1	
c. Component failure field contains data when no component failure occurred.	5	
d. Component failure occurred but entire field left blank.	0	

TABLE C-3. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations: Sub-paragraph Totals[a]	Number of LERs with Deficiencies and Observations: Paragraph Totals ( )[b]
Supplemental Report		1 (10)
a. Neither "Yes"/"No" block of the supplemental report field was checked.	0	
b. The block checked was inconsistent with the text.	1	
Expected submission date information is inconsistent with the block checked in Item (14).		0 (10)

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

APPENDIX D

LER COMMENT SHEETS FOR
LASALLE 1 and 2

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments
1. LER Num	85-063-01
Scores: $Text$ = 9.0	Abstract = 9.1 Coded Fields = 8.6 Overall = 9.0
Text	1. 50.73(b)(2)(ii)(D)--The root and/or intermediate cause discussion concerning the clogged orifice is not included.
	2. 50.73(b)(4)--Discussion of corrective actions taken or planned is inadequate. The text should discuss whether or not anything needs to be done to prevent the orifice from clogging again.
Abstract	1. No comments.
Coded Fields	1. Item (4)--Title: Root cause is not included. It is best not to use acronyms in the title. A better title might be "Spurious Trip of the Control Room Chlorine Detector due to a Clogged Detector Orifice".
	2. Item (8)--Information in field is inconsistent with text and/or abstract. The text and abstract do not clarify how Unit 2 was affected. Is the control room a common facility to both units?
	3. Item (12)--Position title is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments
2. LER Number: 85-066-00	
Scores: Text = 8.9 Abstract =9.2 Coded Fields = 9.2 Overall = 9.0	
Text	1. OBSERVATION: Scores for this LER are based on the assumption that the supplemental report will contain all the necessary information.
	2. 50.73(b)(2)(ii)(F)--EIIS codes are required for each component and system referred to in the text. Codes should be provided for the valves mentioned in the text.
	3. 50.73(b)(2)(ii)(L)--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included.
	4. The use of an outline format is very good.
Abstract	1. 50.73(b)(1)--Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. The abstract should state that the leak rate is in excess allowed by Technical Specifications.
Coded Fields	1. Item (4)--Title: Root cause is not included. "Cause Unknown" can be included in the title.
	2. Item (11)--OBSERVATION: It appears it would have been appropriate to also report this event under paragraph(s) 50.73(a)(2)(i)(B).
	3. Item (12)--Position title is not included.
	4. Item (13)--Cause, system, and/or component code is inconsistent with text. Since the cause of the failure is not known at this time, X may be a more appropriate cause code.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments

3. LER Number: 85-069-00

Scores: Text = 8.6 Abstract = 9.4 Coded Fields = 8.8 Overall = 8.8

Text

1. 50.73(b)(2)(ii)(C)--Time information for major occurrences is inadequate. The time that the uninspected fire hose stations were declared inoperable should have been provided, given that T.S. 3.7.5.4 has a 1-hour Action Statement.

2. 50.73(b)(2)(ii)(I)--Discussion of the method of discovery of the overdue surveillance is not included. Who notified the Station Fire Marshall and the Unit 1 Operating Engineer?

3. 50.73(b)(2)(ii)(J)(2)--Discussion of the personnel error is inadequate.

   50.73(b)(2)(ii)(J)(2)(i)--Discussion as to whether the personnel error was cognitive or procedural is not included.

4. 50.73(b)(3)--Discussion of the assessment of the safety consequences and implications of the event is inadequate. If all required fire equipment had not been at the fire hose station as required, was there any other system or method of providing fire protection to those areas that would normally be protected by the hose stations?

5. 50.73(b)(4)--Discussion of corrective actions taken or planned is inadequate. Given the four previous occurrences of a similar nature, is there a need for some procedure changes involving the General Surveillance Program? Will all future personnel (required to schedule, perform, or ensure turnover) receive the necessary training to prevent recurrence of this event?

6. Some conclusions reached are inconsistent with the facts presented. It is not clear why the temporary surveillance foreman decided his manpower was insufficient, given he had a crew of 12 instead of the normal of 6.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments
3. LER Number:	85-069-00 (continued)
Abstract	1. The abstract should contain the "date" information that was presented in the text so that the reader will have an idea of the time-history of the event.
Coded Fields	1. Item (4)--The title should indicate that the missed surveillance is a Technical Specification violation.
	2. Item (8)--It is not apparent from the information provided in the text why LaSalle Unit 2 was named as another facility that was directly affected by (involved in) the event.
	3. Item (12)--Position title is not included.
	4. Item (13)--Component failure field contains data when no component failure occurred.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments
4. LER Number: 86-002-00	
Scores: Text = 8.2 Abstract = 8.0 Coded Fields = 8.5 Overall = 8.1	
Text	1. 50.73(b)(2)(ii)(F)--The text did not include the EIIS component codes for each component referred to in the text.
	2. 50.73(b)(2)(ii)(H)--A time estimate of the unavailability of the failed system is not included.
	3. 50.73(b)(3)--Discussion of the assessment of the safety consequences and implications of the event is inadequate. The assessment should indicate whether or not the 14 SRV's, which would open before SRV 1B21-F013U, are adequate to handle any possible pressure transient. If the 14 valves are not sufficient protection, then the assessment should assess the effect of the late opening of SRVs 1B21-F013U, E, and H.
	4. 50.73(b)(4)--Discussion of corrective actions taken or planned is inadequate. A discussion of actions required to reduce the probability of recurrence (i.e, correction of the root cause) is not included or is inadequate. Could anything be done to minimize the foreign material, dirt, and rust in the system? Could surveillance be done with less pressure differential across the valves?
Abstract	1. 50.73(b)(1)--Summary of root cause is inadequate. The foreign material, dirt, and rust, as well as, the high differential pressure during surveillance cycling should be mentioned.
	2. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract. The third paragraph in the abstract addresses the text deficiency discussed in text comment 3.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments
4. LER Number:	86-002-00 (continued)
Coded Fields	1. Item (4)--Title: Root cause is not included. 2. Item (11)--OBSERVATION: It appears it would have been appropriate to also report this event under paragraph(s) 50.73(a)(2)(i) and 50.73(a)(2)(vii). 3. Item (13)--Where all three valves are identical and in identical systems only one line needs to be filled in for the three valves.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section		Comments
5. LER Number: 86-003-00		
Scores: Text = 9.3	Abstract = 9.2	Coded Fields = 9.4 Overall = 9.3
Text	1.	Since the initiating problem that led to the missed Technical Specification surveillance was the no flow condition through the sample line, the cause and corrective action for this should be discussed.
Abstract	1.	50.73(b)(1)--See text comment 1.
Coded Fields	1.	Item (4)--Title: Result is not included. The title should indicate the missed surveillance was required by the Technical Specifications.
	2.	Item (13)--Cause, system, and/or component code is inconsistent with text. The text does not indicate the sample panel failed due to personnel error.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments
6. LER Number: 86-004-00	
Scores: Text = 8.7 Abstract = 7.6 Coded Fields = 9.8 Overall = 8.5	
Text	1. 50.73(b)(2)(ii)(E)--The effect discussion of each failed component is inadequate. The ESF actuation should have been described in the first sentence of Section I. Section III implies that the ammonia alarm resulted in the "A" HVAC train going to the recirculation mode but Section I implies that the "A" HVAC train was already in the recirculation mode at the time of the event (i.e., at 1917 on February 5, 1986). It is also not clear whether the trip of the chlorine detector causes only an alarm or would also cause an ESF actuation (had the signal not already been present from the ammonia detector).
	2. 50.73(b)(2)(ii)(F)--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included.
	3. 50.73(b)(2)(ii)(J)(2)--It appears that personnel error is involved in this event, but it is not discussed. It appears that the non-licensed operator reset the wrong detector by mistake.
	4. 50.73(b)(4)--Discussion of corrective actions taken or planned is inadequate. A discussion of actions required to reduce the probability of recurrence (i.e, correction of the root cause) is not included or is inadequate. What will the warning sign on the four chlorine detectors say? If the reader knew this, he would probably have the answer to the concern expressed in text comment number 1.
	5. Some ideas are not presented clearly (hard to follow). For example, the second paragraph in Section II states that "Optical equipment compares the exposed tape portion to an exposed section of the tape - - ".

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 1 (373)

Section	Comments
6. LER Number:	86-004-00 (continued)
	6. A logical transition does not exist between all ideas. "Odor eaters" are introduced in Section I but not defined until Section III.
	7. Acronym(s) and/or plant specific designator(s) are undefined. What is AIR 373-200-86-01200?
	8. It is not apparent which system the ammonia detector is associated with, (i.e., "VI", "VC", or "VE").
Abstract	1. 50.73(b)(1)--Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. The chlorine detector occurrence should have been mentioned.
	2. 50.73(b)(1)--Summary of the root cause of the tape breakage is not included.
	3. 50.73(b)(1)--Summary of corrective actions taken or planned as a result of the event is inadequate. See text comment number 4.
	4. Abstract contradicts the text. The "hour" of the ammonia detector trip is different in the abstract. In addition see the second sentence of text comment number 1.
Coded Fields	1. Item (8)--It is not apparent from the text how Unit 2 is directly affected by the event; (it is assumed that the control room is common to both units, but this is not stated in the text).
	2. Item (13)--One or more component failure sub-fields are blank; namely the manufacturer of the detector.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 2 (374)

Section	Comments
7. LER Number: 85-044-00	
Scores: Text = 9.1	Abstract = 9.7 Coded Fields = 9.0 Overall = 9.3
Text	1. 50.73(b)(2)(ii)(F)--The EIIS component codes for each component referred to in the text were not included. The presentation of plant acronyms and EIIS system codes together is confusing.
	2. 50.73(b)(2)(ii)(L)--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included. The manufacturer and model number of the timer are not included.
Abstract	1. No comments.
Coded Fields	1. Item (4)--Title: Root cause is not included. It is best not to use acronyms in the title.
	2. Item (12)--Position title is not included.
	3. Item (13)--The first line is appropriate, but the partially filled in second line should be left out.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 2 (374)

Section	Comments
8. LER Number: 85-046-00	
Scores: Text = 9.5	Abstract = 8.8 Coded Fields = 9.0 Overall = 9.2
Text	1. No comment.
Abstract	1. 50.73(b)(1)--Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. The abstract should state that this was a condition prohibited by the Technical Specifications.
	2. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract. The information in last sentence is not included in the text.
Coded Fields	1. Item (4)--Title: Root cause is not included.
	2. Item (7)--OBSERVATION: Report date is not within thirty days of event date (or discovery date if appropriate).
	3. Item (12)--Position title is not included.
	4. Item (13)--Component failure field contains data when no component failure occurred.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 2 (374)

Section	Comments
9. LER Number: 85-047-00	
Scores: Text = 7.6 Abstract = 8.5 Coded Fields = 8.6 Overall = 8.0	
Text	1. 50.73(b)(2)(ii)(F)--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. No code is provided for the components referred to in the text.
	2. 50.73(b)(2)(ii)(I)--Discussion of the method of discovery of the missed samples is not included. When and how was it determined that the samples had not been taken as required?
	3. 50.73(b)(2)(ii)(J)(2)--Discussion of the personnel error is inadequate. Was it a cognitive or procedural error (or a part of the work request) that resulted in the decision by the Shift Foreman to leave the RHR SW system running.
	4. 50.73(b)(3)--Discussion of the assessment of the safety consequences and implications of the event is inadequate. What would have been the consequences, if any, of the system becoming contaminated (radioactively) during the period that the system was not monitored?
	5. 50.73(b)(4)--Discussion of corrective actions taken or planned is inadequate. A supplemental report appears to be needed to describe the corrective actions that result from AIR 374-200-85-13100 and 13101. Without a commitment to submit a supplemental report, this LER must be considered incomplete. What interim corrective actions were taken? Is there a need to provide all operators with additional information concerning the use of the time clock easel?
	6. Acronym(s) and/or plant specific designator(s) are undefined; (NSO).

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 2 (374)

Section	Comments
9. LER Number:	85-047-00 (continued)
Abstract	1. 50.73(b)(1)--Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. The tie between the test failure and the decision to leave the RHR SW system running should be provided. See text comment number 3.
	2. 50.73(b)(1)--Summary of corrective actions taken or planned as a result of the event is inadequate. AIR 374-200-85-13101 should have been mentioned.
Coded Fields	1. Item (4)--Title: Root cause (inadequate shift turnover procedures) and end result (Technical Specification violation) are not included.
	2. Item (12)--Position title is not included.
	3. Item (13)--Component failure field contains data when no component failure occurred.
	4. Item (14)--The block checked is inconsistent with information in the text. See text comment number 5.

TABLE D-1. SPECIFIC LER COMMENTS FOR LASALLE 2 (374)

Section	Comments
10. LER Number: 85-048-00	
Scores: Text = 8.9	Abstract = 10.0 Coded Fields = 9.0 Overall = 9.3
Text	1. 50.73(b)(2)(ii)(F)--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included.
	2. 50.73(b)(2)(ii)(L)--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included.
Abstract	1. No comments.
Coded Fields	1. Item (4)--Title: Root cause (unknown) is not included. It is best not to use acronyms in the title.