



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
801 WARRENVILLE ROAD  
LISLE, ILLINOIS 60532-4351

March 6, 1998

Mr. Oliver D. Kingsley  
President, Nuclear Generation Group  
Commonwealth Edison Company  
ATTN: Regulatory Services  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: NRC OVERSIGHT PANEL MEETING SUMMARY

Dear Mr. Kingsley:

The NRC Oversight Panel met with Commonwealth Edison and LaSalle County Station management on February 24, 1998. This management meeting was open to public observation. Enclosure 1 contains the associated meeting summary. Enclosure 2 contains the handout provided to the NRC Oversight Panel by Commonwealth Edison during the meeting.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in NRC's Public Document Room.

Sincerely,

Geoffrey E. Grant, Director  
Division of Reactor Projects

Docket Nos.: 50-373; 50-374  
License Nos.: NPF-11; NPF-18

Enclosures: 1. Meeting Summary  
2. Meeting Handout

See Attached Distribution

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PDR ADOCK 05000373  
P PDR



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cc w/encl: M. Wallace, Senior Vice President  
D. Helwig, Senior Vice President  
G. Stanley, PWR Vice President  
J. Perry, BWR Vice President  
D. Farrar, Regulatory  
Services Manager  
I. Johnson, Licensing Director  
DCD - Licensing  
F. Dacimo, Site Vice President  
T. O'Connor, Station Manager  
P. Barnes, Regulatory Assurance  
Supervisor  
Richard Hubbard  
Nathan Schloss, Economist  
Office of the Attorney General  
State Liaison Officer  
Chairman, Illinois Commerce  
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/s Geoffrey E. Grant

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NAME	Hills:nmo	DETA	Grant	GGG
DATE	03/6/98		03/6/98	

OFFICIAL RECORD COPY

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Distribution:

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T. Hiltz, OEDO w/encls

**Enclosure 1**  
**Public Meeting Summary**  
**NRC Oversight Panel for LaSalle County Station**

**February 24, 1998, Management Meeting**

**Summary:**

The licensee provided the NRC Oversight Panel with a handout (Enclosure 2) and discussed the information contained in the handout during the meeting. The discussion centered around the status of the LaSalle Restart Plan and the various actions necessary for Unit 1 restart. In particular, the licensee described action plans for improving plant material condition and engineering support. In addition, the licensee discussed recent experience related to the corrective actions and human performance improvement strategies. The licensee also addressed the Unit 1 Restart Strategy Action Plan implementation status and the status of license amendments required for Unit 1 restart. During the licensee's presentation, the licensee addressed NRC questions and comments.

The licensee indicated the following with regards to the effectiveness of improvement actions and current plant performance:

- Implementation of the Restart Strategy Action Plans and departmental assessments were in progress with several activities scheduled following completion of the work planned for the outage.
- The human performance improvement initiatives, which were considered completed by the licensee during the previous public meeting, no longer met the goals established for restart. The licensee identified that their control over vendors was an emerging issue and actions were being taken by licensee management to address the issue.
- The licensee performed a corporate assessment which identified a strength in the extent of the plant staff participation in the corrective action process. However, the corporate assessment identified that additional management attention was needed to ensure continued improvement in this area. Action was being taken to address the findings.
- The licensee was not meeting the performance measures established in the LaSalle Restart Plan for the strategy implemented to address the Unit 1 outage plan. Scope growth was greater than 5 percent and critical path performance was not on or ahead of schedule. In addition, the licensee identified that the processes were challenging the operators as the last line of defense. Corrective actions were discussed to improve performance in this area.
- A brief discussion of the licensee's plans to improve the engineering capability at the LaSalle Station addressed continued efforts to qualify system engineers and improve the quality of the various engineering products. The engineering product quality improvements were also discussed.
- Processing of license amendments required prior to restart were proceeding according to the schedule.

- The licensee anticipated that Unit 1 would not be ready for restart prior to early July 1998. Planning efforts which would provide a more accurate expected restart date were ongoing but not yet complete.

During the discussion, the NRC staff communicated the following considerations:

- The NRC staff questioned the licensee on how problems identified at the station were being evaluated to determine if generic or broad-based problems existed that may require more extensive corrective action. The NRC staff stressed the importance of evaluating corrective actions to ensure they address generic or broad-based problems, if appropriate, rather than be narrowly focused only on the specific problem.
- The licensee's schedule for restart needs to be accurately communicated to NRC staff in order to ensure that adequate time is available for planning and staffing inspection activities required prior to restart.
- The quality of the work control processes with respect to the licensee's ability to accomplish work, both design changes and maintenance, will be thoroughly evaluated by NRC staff prior to restart.

## Meeting Attendees

### Nuclear Regulatory Commission

A. B. Beach, Regional Administrator, Region III  
R. Capra, Director, Project Directorate III-2, Office of Nuclear Reactor Regulation  
G. Grant, Director, Division of Reactor Projects, Region III  
K. O'Brien, Acting Chief, Branch 2, Division of Reactor Projects, Region III  
M. Huber, Senior Resident Inspector, Division of Reactor Projects, Region III  
E. Duncan, Reactor Inspector, Division of Reactor Safety, Region III  
J. Hansen, Resident Inspector, Division of Reactor Projects, Region III

### Commonwealth Edison

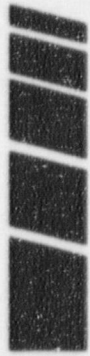
O. Kingsley, President, Nuclear Generating Group  
D. Helwig, Senior Vice-President  
S. Perry, Vice-President of Boiling Water Reactor Operations  
D. Sager, Vice-President, Generation Support  
F. Dacimo, Site Vice-President, LaSalle  
T. O'Connor, Station Manager, LaSalle  
G. Poletto, Site Engineering Manager, LaSalle  
D. Farr, Operations Manager, LaSalle  
W. Riffer, Quality and Safety Assessment Manager, LaSalle  
P. Barnes, Regulatory Assurance Supervisor, LaSalle  
S. Smith, Restart Manager, LaSalle  
W. Halcott, Site Construction Manager, LaSalle  
T. Broccolo, Corporate Assessment Manager  
P. Higgins, Outage Manager, LaSalle  
B. Trafton, Nuclear Station Operator, LaSalle  
C. Shroeder, Decommissioning Services Manager  
D. Sergent, Radiation Protection Technician, LaSalle  
J. Henry, Shift Operations Supervisor, LaSalle  
L. Volkman, Administrative Support, LaSalle

### Other

J. Dresen, Wisconsin Electric  
K. Sutton, Winston & Strawn  
T. Poindexter, Winston & Strawn  
D. Stinson, Executive Vice-President, Intergraph Corporation  
S. Reeder, Raytheon  
P. Doverspike, General Electric  
A. Leskanciek, Visitor (General Public)

Enclosure 2

Commonwealth Edison  
Management Meeting Handout



# ***Station Direction***

**World Class Performance**



**Safe, Long, Uneventful Run**



**Safe, Uneventful Startup**

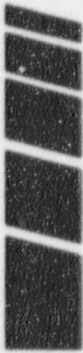
**February 24, 1998**

**Brookfield Township Hall**

**LaSalle**



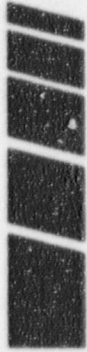
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**NRC Public Meeting  
February 24, 1998  
1030 - 1230**

- NRC Introduction Grant/Beach
  
- LaSalle Introduction Dacimo
  
- Restart Strategy Action Plan Summary O'Connor
  - Material Condition (Strategy 3, Action Plan 3.1) O'Connor
  - Material Condition (Strategy 3, Action Plan 3.3) Smith
  - Engineering Support (Strategy 4 Action Plan 4.1) Poletto
  - License Amendments Barnes
  
- Closing Remarks Dacimo
  
- NRC Closing Remarks Grant/Beach

**LaSalle**



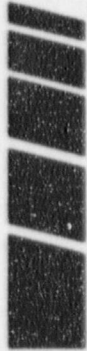
## ***Introduction***

- **Unit 1 Restart Program Process**
- **Unit 1 Restart Program Status**
- **Action Plans Implementation Status**
  - **Material Condition (Action Plans 3.1 and 3.3)**
  - **Engineering Support (Action Plan 4.1)**
- **Unit 1 Integrated Schedule**



## ***Steps to Unit 1 Readiness For Restart***

- **In Progress**
  - Implement Restart Strategy Action Plans
  - Departmental Readiness Assessments
  - Restart Issue Review Committee Restart Recommendation
  
- **Scheduled**
  - Q&SA Restart Readiness Assessment
  - Site Vice President Restart Recommendation
  - Independent Restart Readiness Assessment
  - Chief Nuclear Officer Restart Recommendation
  - NRC Confirmatory Action Letter Closure Meeting



# Unit 1 Restart Strategy Action Plan Implementation Status

Strategy	Total Action Plans	Restart Manager Approve	Q&SA Review	Site Readiness Measures Met
1 Safe Plant Operation	9			No
2 Human Performance	1	1	1	No
3 Material Condition	2			No
4 Engineering Support	2			No
5 Corrective Actions	3	3	3	No
6 Training	1	1		No
7 Process Improvement	1			No
Totals	19	5	4	

NOTE: 335 of 374 Action Plan Steps Implemented

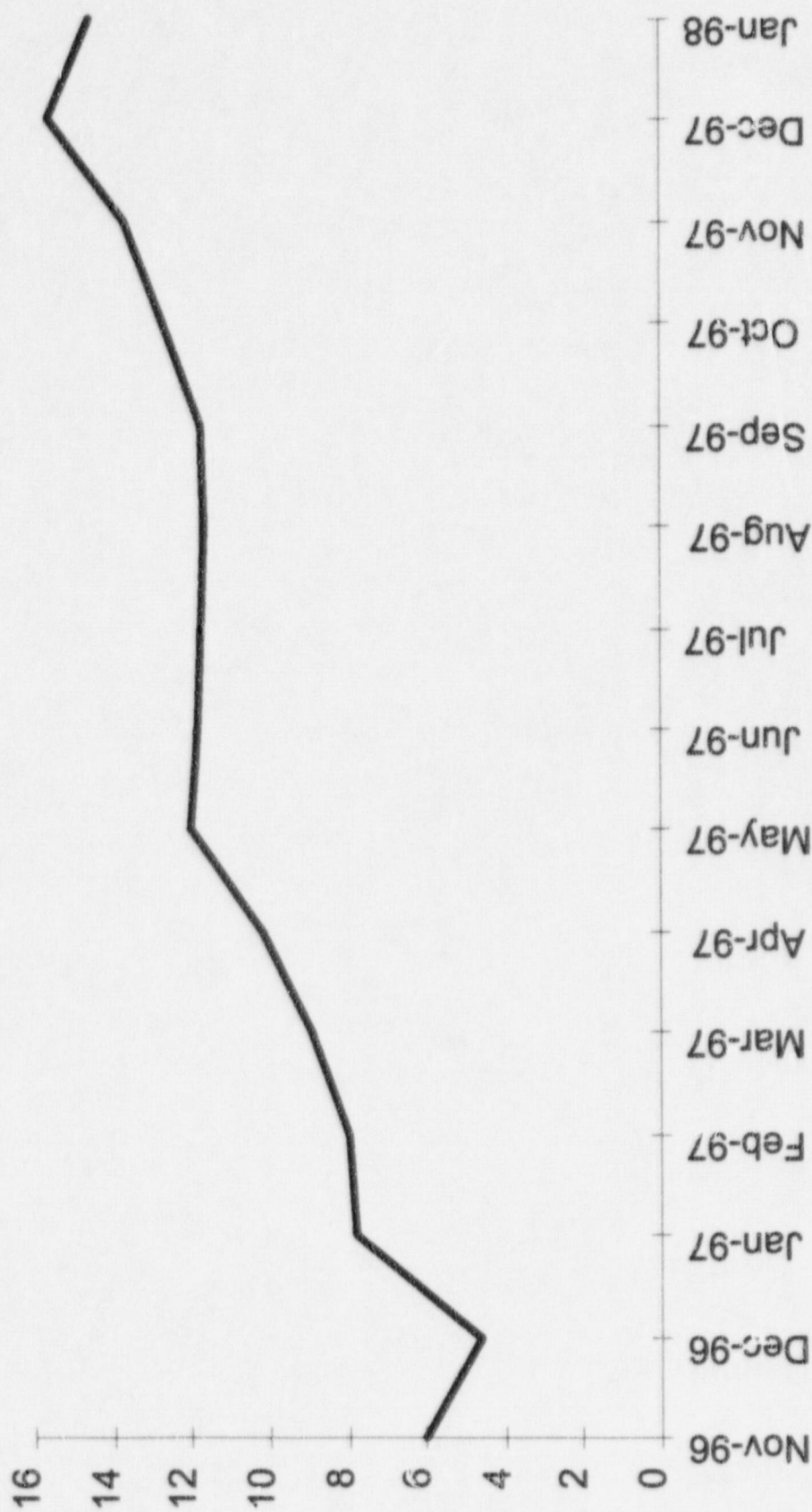


# Restart Action Plan Status

No.	Action Plan	Unit 1 Plan Step Implementation	Restart Manager Approve	Associated NRC 0350 Checklist Items
1.1	Monitor Critical Operation Function	17 of 17	0	5
1.1	Operator Work Environment	36 of 48	0	0
1.1	Restart and Power Ascension Plan	7 of 17	0	5
1.2	Operator Work-Arounds	9 of 12	0	4
1.2	Temporary Challenges	7 of 10	0	2
1.2	Main Control Room Challenges	6 of 6	0	3
1.3	Plant Labeling	46 of 46	0	0
1.3	Out-of-Service Program	16 of 16	0	1
1.3	Operating Procedures	19 of 20	0	2
2.1	Human Performance and Interaction	22 of 22	22	6
3.1	Unit 1 Outage Plan	21 of 24	0	3
3.3	Maintenance Backlog Review Plan	3 of 6	0	1
4.1	Engineering Capability	15 of 18	0	4
4.2	Plant Operational Readiness	44 of 44	0	9
5.1	Corrective Action Program	17 of 17	17	5
5.2	Improve Q & SA Effectiveness	11 of 11	11	2
5.3	Improve Self-Assessments	2 of 2	1	2
6.1	Operator Training	16 of 17	16	1
7.1	Procedures	20 of 20	0	1
	Totals	335 of 374	67	

# Event Free Clock

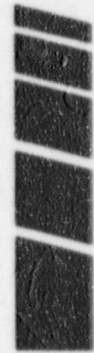
## Average Days Between Events





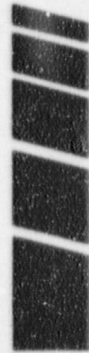
## **Action Plan 2.1 Human Performance**

- **Event Free Clock Resets (Since 1/26/98)**
  - **Fire Protection Surveillance**
  - **IST Program Corrective Action Implementation**
  - **Rad Material Outside RPA**
  
- **Data Analysis Shows Issue With ComEd Control Of Vendors**
  - **Actions Taken**
    - **Reduced Vendors/Contractors Onsite**
    - **Station Manager Accountability Session With Vendors**
    - **New ComEd Construction Management**
    - **Root Cause Initiated With Principal Contractor Corporate Support**
    - **Target Selection Process For Construction/Vendor Supervisors**
    - **Construction Re-aligned Under Maintenance Manager**
    - **Centralized Contractor Control Under Construction Superintendent**
    - **Initiated Restructure of Primary Maintenance Contracts To Include This Corrective Action Strategy**



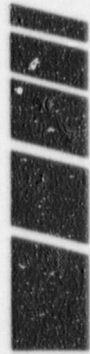
## **Action Plan 5.1 Corrective Actions**

- Corporate Assessment (Week of 2/2/98)
  - Critical Review Of Program Implementation
    - + Significant Strength In Site Worker Participation
    - Program Elements Implemented; Some Better Than Others
      - Line Management Involvement
      - Accountability In Meeting Commitments
  - Actions Taken Prior To Assessment
    - CARB Membership Revised
    - New NTS Item Extension Control In Place
    - Station Manager Expectations To Senior Site Managers
  - Follow-up Action Implementation By 2/28/98



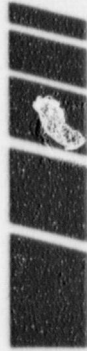
## **Action Plan 3.1 Unit 1 Outage Plan**

- **Objective:** Develop and implement Unit 1 outage plan that identifies and organizes the completion of work to improve plant materiel condition to support safe unit startup and power operation.
  
- **Performance Measures**
  - Scope Growth After Discovery Milestones.....</= 5%
  - System Walkdowns / Backlog Reviews.....Complete per Schedule
  - System Functional Performance Reviews.....Complete per Schedule
  - Critical Path Performance.....On/Ahead of Schedule
  
- **Status**
  - Major Activities To Be Completed
    - System Readiness Reviews
    - System Readiness Review Results To Management
    - Track Procedure Completion
  - Associated 0350 Checklist Items - C.2.2.f, C.4.e, C.4.f



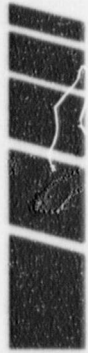
## **Action Plan 3.1 Unit 1 Outage Plan**

- **Performance Assessment -- Not Meeting Expectations**
  - Scope Growth > 5%
  - Schedule Adherence @ 60%
  - Challenges To Operators - Last Line of Defense
  - Use Of Multiple Schedules
  - Site Alignment and Resource Focus



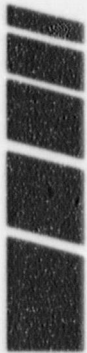
## **Action Plan 3.1 Unit 1 Outage Plan**

- **Actions To Adjust Performance**
  - Continue With Work That Is Ready
  - Assembled 6 Site Teams To Solve Preplanning Barriers
    - Define and Manage Scope Control
    - Define and Implement Outage Planning
    - Build An Accurate Schedule
    - Identify Non-Hardware Scope
    - Assemble An Outage Execution Center
    - Assemble And Implement Paper Closeout

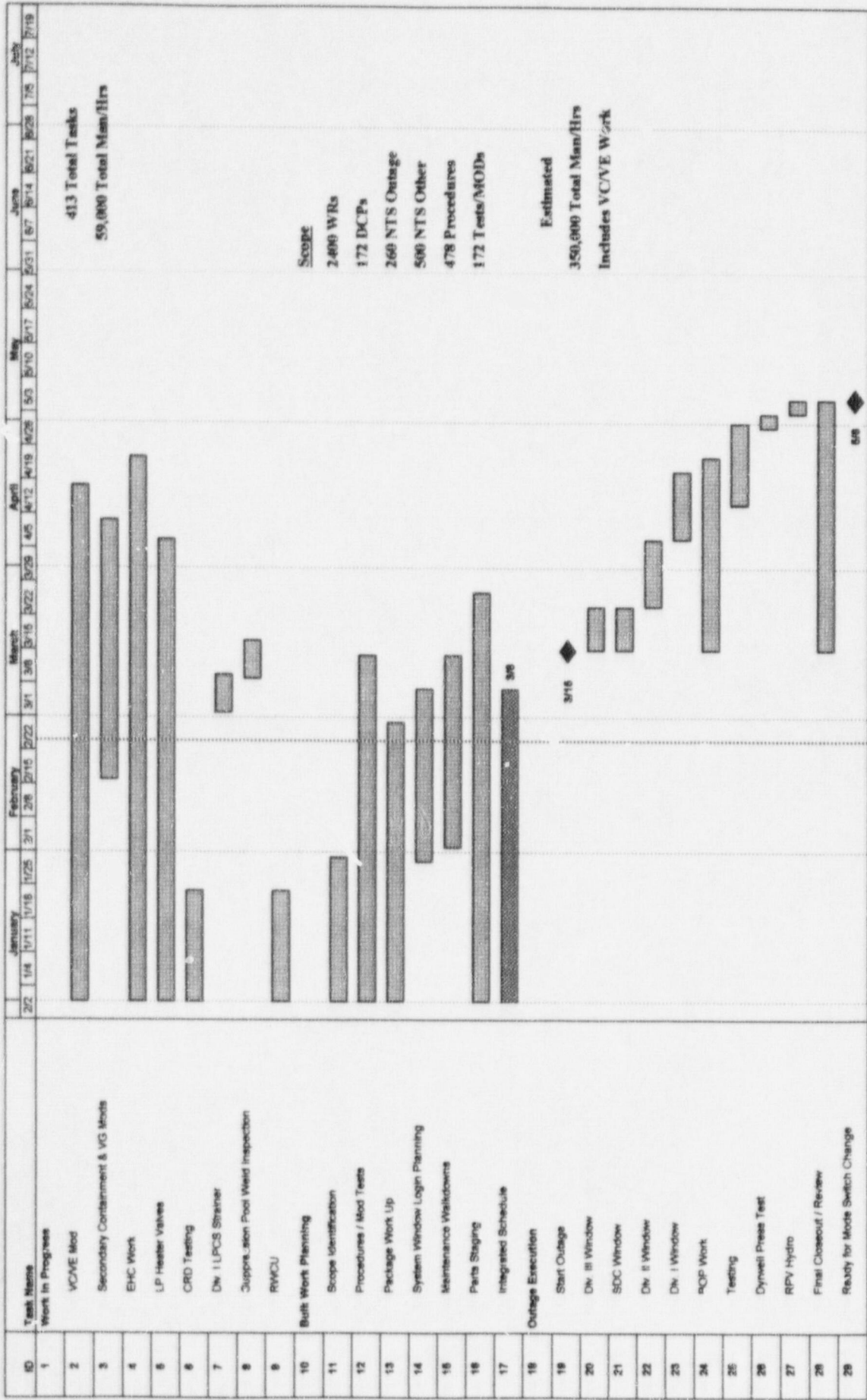


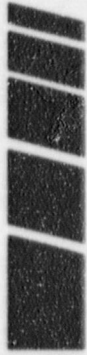
## **Action Plan 3.1 Unit 1 Outage Plan**

- **Actions To Adjust Performance (Continued)**
  - Preplan a Defined Scope of Bulk Work
    - Scope Management Working (3 NWRs/Day vs 25 NWRs/Day)
    - Multi-Discipline Layer Window Review
    - Maintenance Walkdowns to Verify Field Setup to NWR
  - One Integrated, Resourced Schedule For Site
    - Hardware Items
    - Software Items
    - Resources Provided
  - Assemble and Execute A Pre-Planned Scope/Test/Closeout
    - Estimated Schedule Developed



# L1F35 Physical Work For Restart





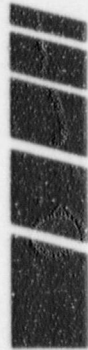
## **L1F35 Scope Management Actions**

- **8,000+ Items Completed**
  
- **2400+ Items to be Completed**
  - 413 In Progress; 87 Critical Path Remaining
  - Bulk Work Meeting Restart Criteria
  
- **1100+ Items Removed From Scope**
  - ~ 780 Non-Outage
  - ~ 60 L1P02
  - ~ 260 L2R07
  - Not Required For Operability/Reliability
  - Consistent With Restart Criteria
  - Allows For Proper Management Focus
  
- **Independent Review Of Scope Control Management By Q&SA and Corporate Oversight**



## **Action Plan 3.3 Maintenance Backlog Review**

- **Objective:** Complete review of NWR Corrective Backlog to define that level which provides acceptable plant materiel condition to support safe unit startup and power operation.
  
- **Performance Measures**
  - Corrective NWR Backlog.....Complete Startup Required NWRs
  
- **Status**
  - Major Activities To Be Completed
    - Scheduling Work
    - Confirming Resource Availability
    - Q&SA Review of Completed Corrective NWR Tasks
  
  - Associated 0350 Checklist Items - C.4.i




## **Action Plan 3.3 Maintenance Backlog Review**

- **Key Activities Since Last Restart Meeting (1/26/98)**
  - CD -10 Window Completed:
    - 250 WR Tasks
    - 1414 Non-Divisional Tasks
      - Corrective Work - 1277
      - Preventive Maintenance - 103
      - Surveillances - 34
    - Significant Work on 11 Major Systems
      - Condensate
      - Feedwater
      - Main Condenser
      - RCIC
      - RBCCW
      - SRVs
    - Circ Water
    - Instrument Nitrogen
    - Main Steam
    - RWCU
    - TBCCW
  - Other Work Activities
    - EHC Flush/Refill
    - Containment Oxygen Monitor Modification
    - Low Pressure Heater Valve Replacements
    - VC/VE Modifications

## **Action Plan 4.1 Engineering Capability**

- **Objective:** Upgrade capability of Engineering through the addition of experienced personnel, additional training of existing personnel and organizational and programmatic changes to ensure that work products meet acceptable quality standards.
  
- **Performance Measures**
  - System Engineer Qualification..... Complete Per Schedule
  - EAG Assessment of Engineering Products.....Improving Trend
  
- **Status**
  - Major Activities To Be Completed
    - Complete System Qualifications For System Engineers
    - Complete Qualification Of System Engineers
    - Effectiveness Review
  
  - Associated 0350 Checklist Items - C.2.2.c, C.3.4.a, C.3.4.b,

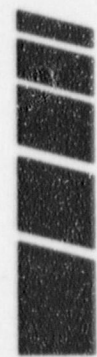
**LaSalle** 

## **Action Plan 4.1 Engineering Capability**

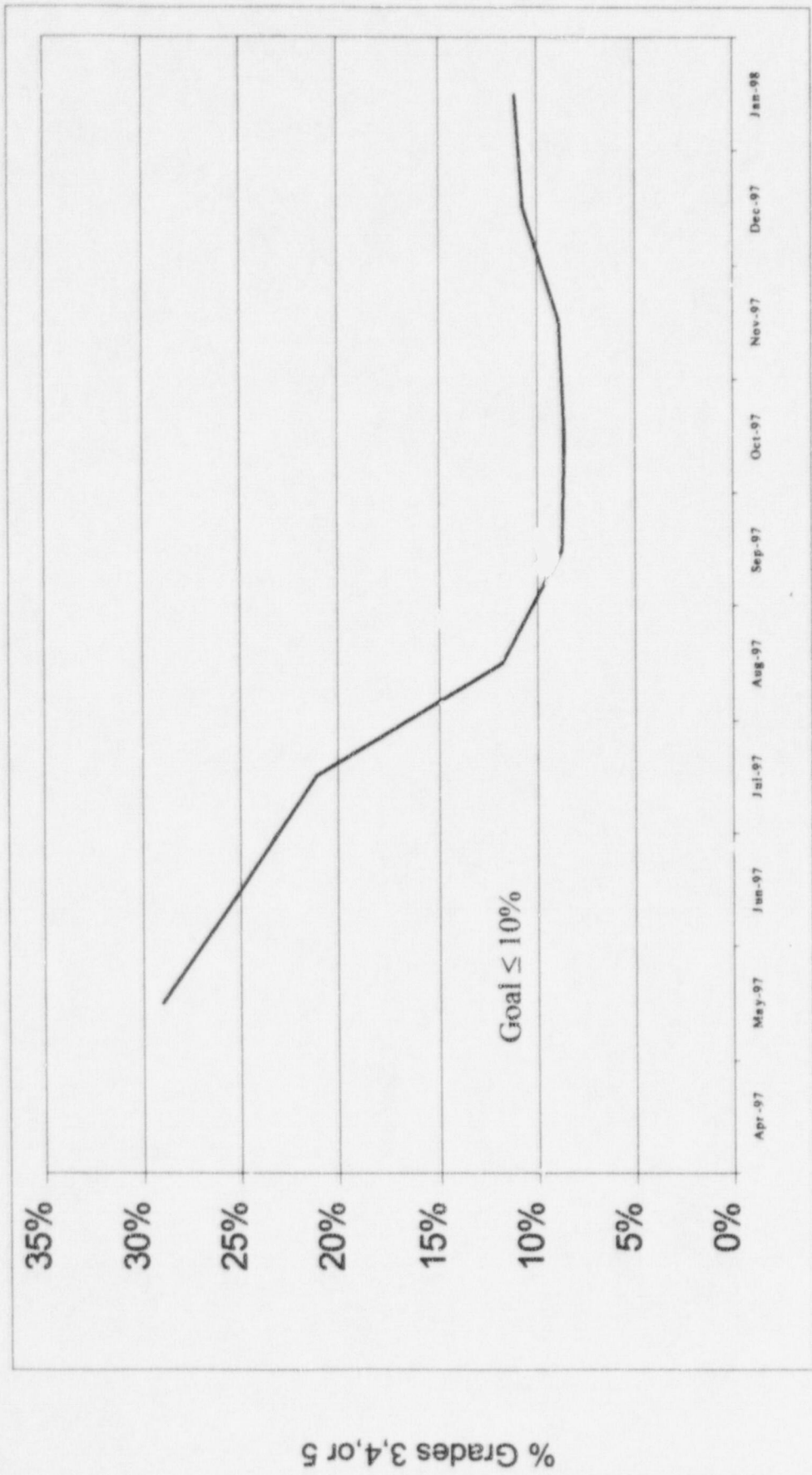
- **Engineering Product Quality**
- **Engineering Assurance Group Self-Assessment**
- **System Engineer Qualification**

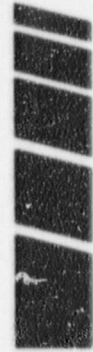
# **Action Plan 4.1 Engineering Capability**

- **Engineering Work Product Quality**
  - Product Quality Improvements Not Sustained
  - Trend Root Cause Performed On ECN and DCP Quality
  - Additional Actions Being Taken

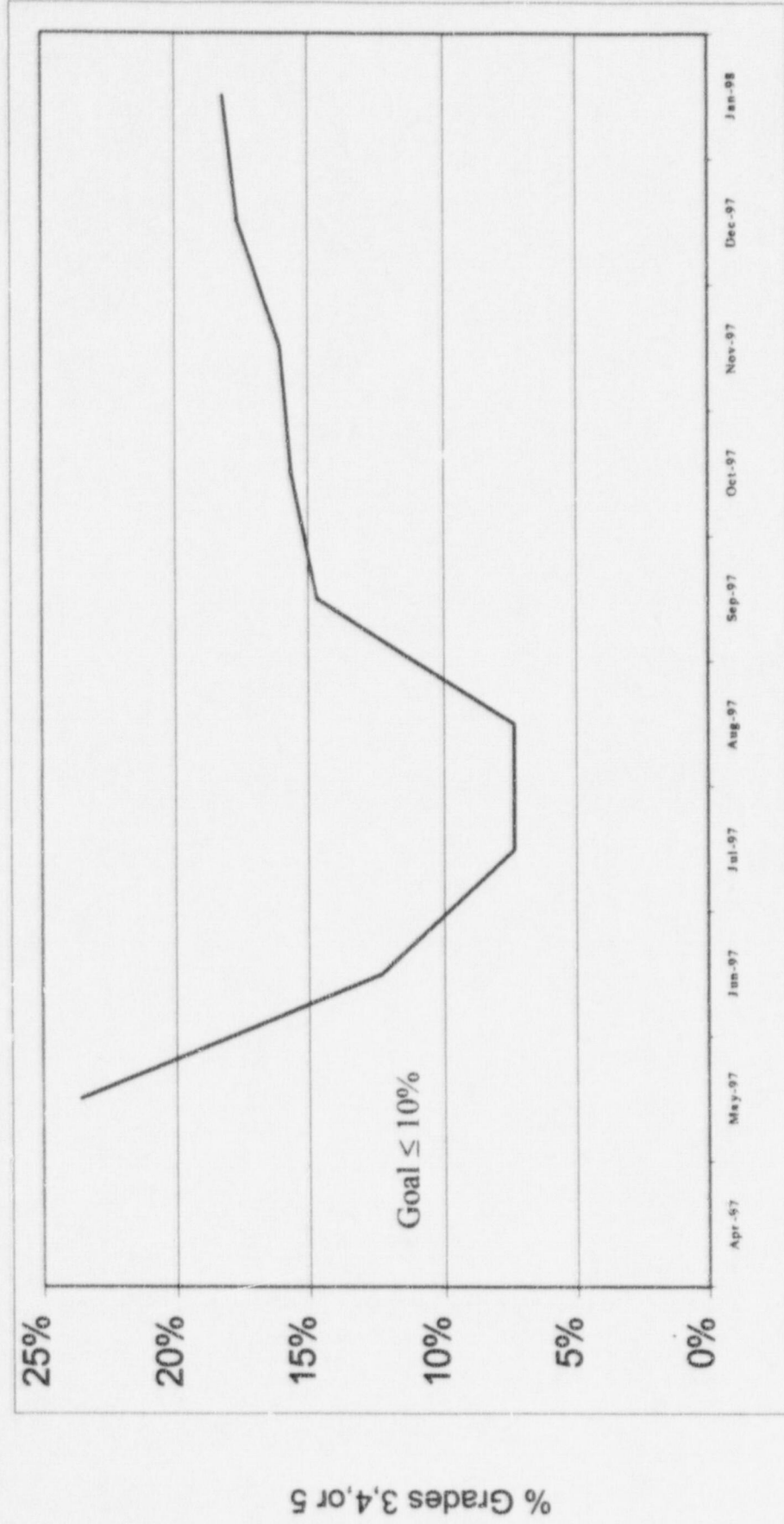


# Safety Evaluations (DCPs) - Quality





# Safety Evaluations (Engr. Procedures)



## **Action Plan 4.1 Engineering Capability**

- **ECN and DCP Quality Trend Root Cause**
  - ECN Procedure Inadequate for Revision to Engineering Data
  - Contractor Personnel Training for EWCS
  - Errors of Omission Account for One Third of PIFs Since May 1997

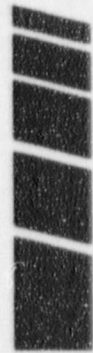


## **Action Plan 4.1 Engineering Capability**

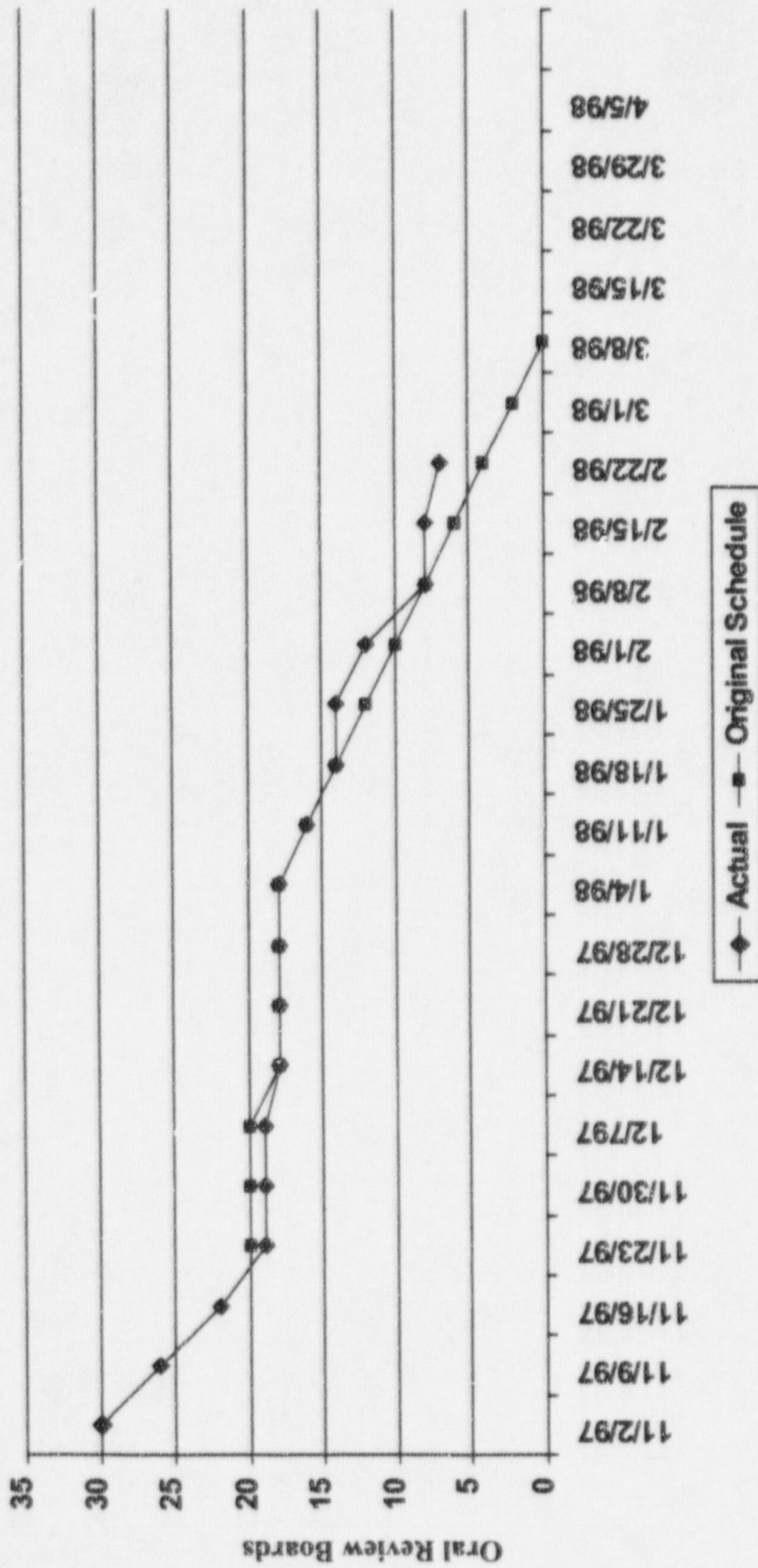
- **Actions Taken For Quality Improvements**
  - Reinforced Product Quality Expectations To Engineering Organization
  - Design Manager and EAG Manager To Review Qualifications And Performance Of Personnel Performing Engineering Product Safety Evaluations
  - Implement Procedure Revision And Training Recommendations From Trend Root Cause
  - Enforce Individual And Supervisor Accountability For Consistent High Product Quality

## **Action Plan 4.1 Engineering Capability**

- **EAG Self-Assessment**
  - Not Meeting Charter For In-Line Reviews For Some Products
  - Concern That EAG Charter Does Not Document Qualification Requirements For EAG Leader and Reviewers
  - Concern Related To EAG Staffing



# System Engineering Qualifications



Date	11/2	11/9	11/16	11/23	11/30	12/7	12/14	12/21	12/28	1/4	1/11	1/18	1/25	2/1	2/8	2/15	2/22	3/1	3/8	3/15	3/22	3/29	4/2	Total	
Added	0	0	0	0	0	0	0	0	0	0	0	-4	0	0	-4	0	0	0	0	0	0	0	0	0	-6
Completed	0	4	4	3	0	0	1	0	0	0	0	0	0	2	0	0	0	1	0	0	0	0	0	0	15
Remaining	30	26	22	19	19	19	18	18	18	18	18	14	14	12	8	8	7	7	7	7	7	7	7	7	7

**LaSalle**



# License Amendments Required for Unit 1 Restart

Amendment/SER	Submitted	Comments	Expected	NRC Approved
LAR 258: Post-LOCA Hydrogen Instrument Channel Calibration Gas	10/15/97	NRC approved.		02/17/98
LAR 178-02: VC/VE Filter Testing	09/26/97	Conference calls held have resulted in 5 questions. NRC will issue a formal RAI. Four questions have been resolved. A revision to the dose calculation is required. The last question is a CLB issue on the justification for using an elevated release in our dose calculation. Telecon with NRR Tech Branch on 2/25/98. Submittal target is 03/06/98.	04/01/98	
LAR 262: Delete reference to Reactor Steam Pressure from Condenser Low Vacuum Isolation per DCPs 9700461/2	12/12/97	Under review; no issues identified to date.	04/30/98	
SER - Submittal of position on venting of leak chase channels during CILRT. NRC SER to be issued.	11/26/97	Site identified two additional leak chase channel configurations in the suppression pool. Supplement submitted 2/20/98. There are 18 leak chase channels that cannot be justified and need to be dispositioned in a supplement to LER 50-373/97-030.	04/30/98	
LAR 255-01: HELB Leak Detection in Secondary Containment	11/24/97	Conference call has resulted in 2 questions. Answers provided informally. Supplement required for revision of RWCU pump suction flow setpoint. Will submit all issues in one package. Submittal target is 03/13/98.	04/30/98	