

NOTICE OF VIOLATION

Commonwealth Edison Company
LaSalle Station - Units 1 and 2

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

As a result of the inspection conducted on May 1-5, 15-19, and 25, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1988), the following violations were identified:

1. LaSalle Unit 1 and 2 Technical Specification Surveillance requirements 4.8.1.1.2d.7 and 13 require that diesel generators be demonstrated operable at least once per 18 months during a shutdown by verifying that all diesel generator trips except the engine overspeed trip (an overcurrent trip for Division 3 only) and an emergency manual trip, are automatically bypassed by an Emergency Core Cooling System (ECCS) signal.

Contrary to the above, since January 1984, the licensee did not demonstrate that the diesel generator automatic trips (except those noted) were automatically bypassed by actuation of the specified relay contact. The licensee's surveillance procedures and test methodology were inadequate to prove that the generator trip interlocks would actually prevent the diesel generator trip during an ECCS actuation. The procedures incorrectly required that an electrical lead wire be disconnected ahead of the lockout relay. Subsequent tests by the licensee on May 2 and 3, 1989, indicated that the relay correctly operated. (373/89010-02; 374/89010-02)

This is a Severity Level IV violation (Supplement I).

2. 10 CFR 50, Appendix B, Criterion VI, as described in Topical Report CE-1-A, Revision 55, and as implemented by Quality Assurance Manual Section 6, requires that measures be established to control the issuance of documents, such as procedures, including changes thereto. Further, changes to procedures are required to be reviewed for accuracy and approved for release by authorized personnel.

Contrary to the above, emergency diesel generator semi-annual operability test Procedures SA-1, Revision 4; SA-2, Revision 6; and SA-3, Revision 7, for all five emergency diesel generators were not reviewed for adequacy and conformance to the requirements of Technical Specification 4.8.1.1.2a.4, and a.5. Revisions to the procedures incorrectly retained steps that required pre-warming and shut down of the engines prior to conducting the 184 day semi-annual surveillance.

8907050265 890628
FDR ADOCK 05000373
Q FDC

As a result, none of the five emergency diesel generators was started from ambient temperature conditions since February 6, 1986, for Diesel "0;" since June 11, 1986, for Diesels "1A" and "2A;" and since January 15, 1987, for Diesels "1B" and "2B." Subsequent testing by the licensee on May 2, 1989, indicated that all five emergency diesel generators were operable. (373/89010-01; 374/89010-01)

This is a Severity Level IV violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion XVI, as described in Topical Report CE-1.A, Revision 55 and as implemented by Quality Assurance Manual Section 16, requires that measures be established to assure conditions adverse to quality, such as failures and deficiencies are promptly identified and corrected.

Contrary to the above, as of May 20, 1989, the licensee failed to promptly inspect, correct, or justify continued operation of more than 50 Unit 1 and 2 motor operated valves (MOV's) that were subject to common mode failures of torque switches made of melamine material as described in the 10 CFR 21 Report issued by Limitorque Corporation on November 23, 1988. By May 20, 1989, the licensee completed a Justification for Continued Operation of the MOV's. (373/89010-03; 374/89010-03)

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

6/23/89

Richard W. Cooney for
Hubert J. Miller, Director
Division of Reactor Safety

EXECUTIVE SUMMARY

An announced NRC team inspection of maintenance was conducted at LaSalle County Station, Units 1 and 2 during the period of May 1-5, 15-19, and 25, 1989. The inspection was conducted to evaluate the extent that a maintenance program had been established and implemented at LaSalle County Station to assure the preservation or restoration of the availability and reliability of plant structures, systems, and components to operate on demand. Three major areas were assessed including overall plant performance as affected by maintenance, management support of maintenance, and implementation. To accomplish this task, several maintenance related activities were evaluated to determine if maintenance was accomplished, effective, and self-assessed.

Strengths

The inspection team noted specific strengths in the areas of: Progress in meeting scheduled milestones and completion dates of assigned sections of the Conduct of Maintenance Program; use of a reliability centered maintenance type study on the Feedwater System; Plant Improvement Program that included the painting program; use of the Total Job Management program to identify and track instrumentation problems; and use of mockups in training; and improved instrument identification and installation of permanent test jacks will help decrease personnel errors during testing of instrumentation.

Weaknesses

The inspection team noted specific weaknesses. Poor technical support in the review of procedures as illustrated by all five diesel generators being declared inoperable. Poor communications resulted in the untimely and inadequate corrective action associated with the Limitorque 10 CFR 21 report. Another weakness identified was lack of management vigor in a number of prominent areas. This was based on lack of QC involvement in surveillance activities, lack of a comprehensive trending program for corrective maintenance, inadequate controls to monitor the performance of the solenoid discharge valves for the fuel oil transfer pumps of the 2A and 2B diesel generators, inadequate control of non-safety-related balance of plant maintenance that allowed contractor personnel to deviate from procedures and perform activities without adequate licensee oversight, and a nonaggressive response by maintenance personnel to troubleshoot and repair a deficiency noted on the continuity of the ADS solenoid valves. Other weaknesses included: numerous examples of technically incorrect or non-implemented procedures, incorrectly used priority system for work requests, performance indicators that did not measure effectiveness of maintenance, and instances of an overall low level of system awareness and technical knowledge of System Engineers.

Conclusion

Results of this inspection showed overall satisfactory performance in the establishment and implementation of an effective plant maintenance process by the licensee of the LaSalle County Station. Based on the review of past work activities, observations of ongoing work activities, work controls, and attempts at self-assessment the inspectors determined that overall electrical, mechanical, and I&C maintenance and support activities were adequately performed to maintain operability of components at a level commensurate with the components' function. However, some of the activities identified above were in violation of regulatory requirements as noted.