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LaSalle Generating Station
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June 22, 1998

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Information Request
NRC Inspection Report 50-373/374-98009
LaSalle County Station, Units 1 and 2
Facility Operating License NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Reference: G. E. Grant letter to O. D. Kingsley, dated May 22, 1998,
Transmitting NRC Inspection Report 50-373/374-98009

The enclosed attachment contains LaSalle County Station's response to your request for a written description of our assessment of a violation (373/374 -98009-01) regarding incorrect work package classification, which was transmitted in the Reference letter.

If there are any questions or comments concerning this letter, please refer them to Harold D. Pontious, Jr., Regulatory Assurance Manager, at (815) 357-6761, extension 2383.

Respectfully,

A handwritten signature in dark ink, appearing to read "Fred R. Dacimo", is written over a horizontal line.

Fred R. Dacimo
Site Vice President
LaSalle County Station

Enclosure

cc: C. A. Paperiello, Acting NRC Region III Administrator
M. P. Huber, NRC Senior Resident Inspector - LaSalle
D. M. Skay, Project Manager - NRR - LaSalle

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ATTACHMENT
NRC INSPECTION REPORT
373/374-98009

VIOLATION: 373/374-98009-01

On March 3, 1998, licensee maintenance personnel had commenced work on Nuclear Work Request (NWR) No. 97013456-01, to attach two fire protection piping supports to a ceiling in the auxiliary building. The NWR classified the work as non-safety related because the work analyst believed the work was being performed in the turbine building, a non-safety related structure. A work analyst subsequently determined that the support was actually being attached to the auxiliary building which is a safety-related structure. The licensee subsequently revised the NWR on March 4, 1998, to reflect the safety-related nature of the work. The inspectors found that the list of structures and their safety classification generated as a corrective action for the June 1996 service water event was only incorporated into the Electronic Work Control System (EWCS) database and not into all relevant procedures used by work analysts for preparing work packages. The licensee's failure to incorporate the structural safety classification data generated as a result of the service water event into the work package preparation process described in LAP-1300-1T2 is a violation of 10 CFR 50, Appendix B, Criterion XVI (50-373/98009-01(DRP); 50-374/98009-01(DRP)).

ASSESSMENT:

This event was similar to the June 1996 service water sealant injection event in that drilling was done on a safety-related structure using non-safety related work instructions. In this event, the direct cause was that the sealant injection work was not performed using a reviewed and approved NWR, due to improper classification of the work activity. In the fire protection support event, the work was controlled by a reviewed and approved NWR; however, the NWR was incorrectly classified as non-safety related.

One of the corrective actions taken as a result of the June 1996 service water event was to generate a list of all structures and their safety classification. This list was then entered into the EWCS database. Completion of these actions met the commitment made in response to the service water event. However, no training or guidance was provided on the use of this list.

The root cause of the fire protection support event was that the work analyst who prepared the NWR had not been instructed on methods for determining structural classification when making attachments to structures. He used a structural drawing, rather than the floor framing drawing, which would have indicated that the components were in a Class I structure. Since this event, the work analysts have been trained on the proper technique for finding a structural equipment part number (EPN) and using of structural location information in EWCS to determine safety classification.

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Additional corrective actions from the fire protection support event will include procedure changes to require the use of architectural and structural drawings when planning work requests for structures, as well as site specific training for technical reviewers and the Action Request (AR) Screening Committee on the use of architectural and structural drawings.

LaSalle's investigation of this event has identified the root and contributing causes. Appropriate corrective actions have been identified and are being implemented. The root cause report is available onsite for review.

SIGNIFICANCE:

Because the fire protection work was considered "regulatory-related" and contained the same requirements as a safety-related work request, no physical changes were required due to the revised safety classification.