

October 16, 2000

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: LASALLE - NRC INSPECTION REPORT 50-373/2000014(DRS);
50-374/2000014(DRS)

Dear Mr. Kingsley:

On October 6, 2000, the NRC completed a baseline inspection at your LaSalle County Nuclear Power Station. The results of this inspection were discussed on October 6, 2000, with Mr. C. Pardee and members of your staff. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to emergency preparedness and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, this inspection focused on performance during your biennial emergency preparedness exercise and your staff's capability to self-assess your participants' performance. In addition, we reviewed your staff's determinations of performance indicators for the Emergency Preparedness Cornerstone.

Based on the results of this inspection, no findings were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the *Publicly Available Records (PARS) component of NRC's document system (ADAMS)*. *ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html>* (the Public Electronic Reading Room).

O. Kingsley

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We will gladly discuss any question you have concerning this inspection.

Sincerely,

/RA/

Gary L. Shear, Chief
Plant Support Branch
Division of Reactor Safety

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

Enclosure: Inspection Report 50-3732000014(DRS);
50-374/2000014(DRS)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services
C. Crane, Senior Vice President, Nuclear Operations
H. Stanley, Vice President, Nuclear Operations
R. Krich, Vice President, Regulatory Services
DCD - Licensing
C. Pardee, Site Vice President
J. Meister, Station Manager
W. Riffer, Regulatory Assurance Supervisor
M. Aguilar, Assistant Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission
W. Curtis, FEMA, Region V

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 50-373/2000014(DRS); 50-374/2000014(DRS)

Licensee: Commonwealth Edison Company

Facility: LaSalle County Station, Units 1 and 2

Location: 2601 N. 21st Road
Marseilles, IL 61341

Dates: October 2 - 6, 2000

Inspectors: T. Ploski, Senior Emergency Preparedness Analyst
E. Duncan, Senior Resident Inspector
P. Krohn, Resident Inspector
J. Foster, Emergency Response Coordinator

Approved by: Gary L. Shear, Chief
Plant Support Branch
Division of Reactor Safety

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety	Radiation Safety	Safeguards
<ul style="list-style-type: none">● Initiating Events● Mitigating Systems● Barrier Integrity● Emergency Preparedness	<ul style="list-style-type: none">● Occupational● Public	<ul style="list-style-type: none">● Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

SUMMARY OF FINDINGS

IR 50-373/2000014(DRS); 50-374/2000014(DRS), on 10/2 - 10/6/00; Commonwealth Edison Company; LaSalle County Station, Units 1 and 2; Emergency Preparedness

The report covers a one week period of announced inspection by a regional emergency preparedness inspector, the regional emergency response coordinator, and resident inspectors. This inspection focused on the Reactor Safety, Emergency Preparedness Cornerstone, and included the following: evaluation of licensee staff's capability to assess licensee participants' performance during the biennial emergency preparedness exercise; and review of the three performance indicators associated with emergency preparedness.

REACTOR SAFETY

Cornerstone: Emergency Preparedness

There were no findings identified during this inspection (Section 1EP1, Section 4OA1, and Section 4OA5).

Report Details

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

1EP1 Drill, Exercise, and Actual Events

a. Inspection Scope

The inspectors reviewed the 2000 exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan. The inspectors verified that the simulated problems provided an acceptable framework to support demonstration of the licensee's capabilities to implement its emergency plan. An inspector also reviewed records of a practice drill and several tabletop drills conducted in September 2000, to determine whether the associated scenarios were sufficiently different from the scenario used in the October 4 exercise.

The inspectors evaluated exercise performance, focusing on the risk-significant activities of emergency classification, notification, and protective action decision making, as well as implementation of accident mitigation strategies in the following emergency response facilities:

- Control Room Simulator (CRS)
- Technical Support Center (TSC)
- Operational Support Center (OSC)
- Emergency Operations Facility (EOF)

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interface with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the aforementioned facilities to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators to obtain the licensee's refined assessments of its exercise participants' and controllers' performances. These self-assessments were then compared with the inspectors' independent observations and related assessments.

b. Findings

There were no findings identified.

4. **OTHER ACTIVITIES**

40A1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors reviewed records related to each of the three EP indicators to verify the accuracy and completeness of data submitted through June 2000, for the Alert and Notification System (ANS), Emergency Response Organization (ERO) Drill Participation, and Drill and Exercise Performance (DEP) indicators. Procedures for PI data gathering and data quality control were reviewed and discussed with the licensee. Documentation related to the raw data for each indicator was evaluated.

b. Findings

There were no findings identified.

40A5 Temporary Instruction 2515/144

a. Inspection Scope

The inspectors compared the licensee's procedural guidance for identifying key ERO positions versus the guidance of the Nuclear Energy Institute (NEI) 99-02, Revision 0, publication. The inspectors also reviewed records indicating the numbers of personnel assigned to these key positions.

b. Findings

There were no findings identified.

40A6 Management Meetings

Exit Meeting Summary

The inspectors presented the inspection results to Mr. C. Pardee and other members of licensee management and staff at the conclusion of the inspection on October 6, 2000. The licensee acknowledged the findings presented and did not identify any information discussed as proprietary.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Barichello, Assistant Security Administrator
K. Bartes, Nuclear Oversight Manager
D. Bost, Engineering Director
R. Brady, Licensing Manager
A. Daniels, Operations - Unit Planner
T. Gierich, Work Management Manager
J. Henry, Shift Operations Supervisor
A. Howard, EP Coordinator
R. Krohn, EP Trainer
J. Meister, Station Manager
C. Pardee, Site Vice President
P. Quealy, Radiation Protection Superintendent
P. Resler, Communications Director
W. Riffer, Regulatory Assurance Manager
S. Shields, Regulatory Assurance Staff
F. Spangenberg, Site Vice President's Staff
S. Taylor, Radiation Protection Manager
M. Vonk, Nuclear Generation Group EP Director
C. Wilson, Security Force Manager

NRC

E. Duncan, Senior Resident Inspector
P. Krohn, Resident Inspector

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS USED

ANS	Alert and Notification System
CFR	Code of Federal Regulations
CRS	Control Room Simulator
DEP	Drill and Exercise Performance
DRS	Division of Reactor Safety
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERF	Emergency Response Facility
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
GSEP	Generating Stations Emergency Plan
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
OA	Other Activities
OSC	Operational Support Center
PERR	Public Electronic Reading Room
PI	Performance Indicator
TI	Temporary Instruction
TSC	Technical Support Center

INSPECTION PROCEDURES USED

71114	Reactor Safety-Emergency Preparedness
71114.01	Exercise Evaluation
71151	Performance Indicator Verification
TI 2515/144	Performance Indicator Data Collecting and Reporting Process Review

LIST OF DOCUMENTS REVIEWED

Miscellaneous

“LaSalle Station Off-Site Siren Test Plan,” Revision 1, dated January 2000
Ans Daily and Monthly Siren Availability Test Reports April 1999 through June 2000
“2000 LaSalle GSEP Pre-Exercise Evaluation Report,” dated October 2, 2000
“EP Department Training and Reference Material - Drill, Exercise, and Event Performance - NRC Performance Indicator 08 (S.18) Guidance,” Revisions 2 through 6
“EP Department Training and Reference Material - ERO Drill Participation - NRC Performance Indicator 09 (S.19) Guidance,” Revisions 3 through 5
“EP Department Training and Reference Material - ANS Reliability - NRC Performance Indicator 10 (S.20) Guidance,” Revision 2
RS-AA-122-108, Revisions 0 and 1, “Performance Indicator - ERO Drill/Exercise Performance”
RS-AA-122-109, Revisions 0 and 1, “Performance Indicator - ERO Drill Participation”
RS-AA-122-110, Revisions 0 and 1, “Performance Indicator - ANS Reliability”
Records of Functional Drills Conducted on September 21, 25, 26, and 27, 2000
Draft “2000 LaSalle Station NRC-Evaluated Exercise” Self-Assessment, dated October 6, 2000
NEI 99-02, Revision 0, “Regulatory Assessment Performance Indicator Guideline”

Condition Reports

L2000-05487; L2000-05514; L2000-05606

Procedures

LZP-1110-1, Revision 25, “Station Director (Acting Station Director) Implementing Procedure”
LZP-1110-2, Revision 10, “Assistant Station Director Implementing Procedure”
LZP-1120-1, Revision 11, “Operations Director Implementing Procedure”
LZP-1120-2, Revision 10, “OSC Director Implementing Procedure”
LZP-1120-3, Revision 8, “OSC Supervisor Implementing Procedure”
LZP-1130-1, Revision 14, “Technical Director Implementing Procedure”
LZP-1135-1, Revision 10, “GSEP Communications and Communicator Implementing Procedure”
LZP-1140-1, Revision 7, “Maintenance Director Implementing Procedure”
LZP-1160-1, Revision 11, “Administrative Director Implementing Procedure”
LZP-1170-1, Revision 16, “Security Director Implementing Procedure”
LZP-1180-1, Revision 12, “Radiation Protection Director Implementing Procedure”
LZP-1185-1, Revision 2, “Chemistry Director Implementing Procedure”
LZP-1190-1, Revision 8, “Environs Director Implementing Procedure”
LZP-1200-1, Revision 23, “Classification of GSEP Conditions”
LZP-1210-2, Revision 11, “Nuclear Accident Reporting System (NARS) Form”
LZP-1210-5, Revision 1, “Emergency Notification System (ENS) Notifications”
EP-AA-110, Draft Revision 0a, “Assessment”
EP-AA-111, Draft Revision 0a, “Classification”
EP-AA-112, Draft Revision 0a, “ERO/ERF Activation and Operation”
EP-AA-113, Draft Revision 0a, “Protective Actions”
EP-AA-114, Draft Revision 0a, “Notifications”