Commonwealth Edison Company LaSalle Generating Station 2601 North 21st Road Marseilles, IL 613/41-9757 Tel 815-357-6761



March 17, 2000

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

LaSalle County Station, Units 1 and 2

Facility Operating License Nos. NPF-11 and NPF-18

NRC Docket Nos. 50-373 and 50-374

Subject:

Licensee Event Report No. 00-001-00

In accordance with 10 CFR 50.73(a)(2)(i), Commonwealth Edison (ComEd) Company is submitting Licensee Event Report No. 00-001-00, Docket No. 050-373.

Attachment A provides the commitment for this submittal.

Should you have any questions concerning this letter, please contact Mr. Frank A. Spangenberg, III, Regulatory Assurance Manager, at (815) 357-6761, extension 2383.

Respectfully,

Charles G. Pardee Site Vice President LaSalle County Station

Attachments:

Attachment A

Licensee Event Report

cc: Regional Administrator - NRC Region III

NRC Senior Resident Inspector - LaSalle County Station

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# Attachment A Regulatory Commitment(s)

ComEd is committing to the following actions. Any other actions discussed in this submittal represent intended or planned actions by ComEd. They are described for the NRC's information and are not regulatory commitments.

Regulatory Commitment(s)	Tracking Number
The instrument surveillance procedures LIS-RI-101/201, Unit 1/2 "RCIC Steam Line High Flow Isolation Calibration", will be revised to include quarterly calibration of the associated time delay relays.	ATM# 23924-14

NRC FORM 366 U.S. NUCLEAR REGULATO (6-1998)							ORY COMMISSION				APPROVED BY OMB NO. 3150- EXPIRES 06/30/2001								
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines 16)

On February 17, 2000, Units 1 and 2 were in Operational Mode 1 at 100% power. At 1600 hours, based on a review of all safety-related time delay relays listed in procedure LTP-100-6, "Time Delay Relay (TDR) Calibration Program," it was concluded that the quarterly Technical Specification surveillance channel calibration for the Reactor Core Isolation Cooling (RCIC) steam line high flow isolation logic did not include time delay relays 1(2)E51A-K47 and 1(2)E51A-K48. The associated pressure switch is calibrated quarterly and the time delay relay is calibrated each refueling cycle. Since the time delay relay is part of the instrument channel, it should have been calibrated quarterly. Corrective actions were to calibrate the RCIC steam line high flow isolation logic time delay relays and to revise the instrument surveillance procedures.

**DATE (15)** 

The safety significance of the event was minimal. The operability of the Emergency Core Cooling Systems was not challenged. When tested, the time delay relays were found within calibration tolerances.

# LICENSEE EVENT REPORT (LER)

## TEXT CONTINUATION

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## PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor, 3323 Megawatts Thermal Rated Core Power

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

#### A. CONDITION PRIOR TO EVENT

Unit(s): 1/2

Event Date: 02/17/00 Power Level(s): 100

Event Time: 1600 Hours

Reactor Mode(s): 1 Mode(s) Name: Run

#### в. DESCRIPTION OF EVENT

On February 17, 2000, while performing a review of parameters/functions that should be included in the Improved Technical Specification (ITS) submittal for Commonwealth Edison Boiling Water Reactors, Quad Cities and Dresden Stations identified that the required time delay on their low steam line pressure function was not specified in their current Technical Specifications. It was also identified that the time delay relays were calibrated at a different interval than the associated pressure switches. The time delay relays were being calibrated on a once per cycle frequency, while the pressure switches were calibrated on a quarterly frequency in accordance with the Technical Specifications.

In response to these findings, LaSalle County Station initiated Problem Identification Form (PIF) # L2000-00787 to determine if a similar deficiency existed. A review of safety-related time delay relays was performed. This review identified that only the Reactor Core Isolation Cooling (RCIC)[BN] steam line high flow isolation logic time delay relays 1(2)E51A-K47 and 1(2)E51A-K48 were not calibrated at the same interval as the associated instrument channel. In each of these cases, the associated pressure switch is calibrated quarterly and the time delay relay was calibrated each refueling cycle. Since the time delay relay is part of the instrument channel, it should have been calibrated quarterly.

This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B), any event or condition prohibited by the plant's Technical Specification.

#### C. CAUSE OF EVENT

The root cause of the event was determined to be personnel error resulting from inadequate knowledge of industry standards when the time delay relay was added to the instrument channel in 1982, and when the subsequent system reviews were performed in 1991 and 1997.

# LICENSEE EVENT REPORT (LER)

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## D. SAFETY ANALYSIS

The safety significance of this event was minimal. The operability of the redundant Emergency Core Cooling Systems was not challenged. When calibrated, the as-found settings for the time delay relays were found to be in calibration.

### E. CORRECTIVE ACTIONS

### Immediate Actions:

- 1. The RCIC steam line high flow isolation logic time delay relays for Unit 1 and 2 were calibrated to meet the quarterly surveillance requirements.
- 2. An extent of condition review of all safety-related time delay relays was performed. This review identified that only the Reactor Core Isolation Cooling (RCIC)[BN] steam line high flow isolation logic time delay relays 1(2)E51A-K47 and 1(2)E51A-K48 were not calibrated at the same interval as the associated instrument channel.

# Corrective Actions to Prevent Recurrence

3. The instrument surveillance procedures LIS-RI-101/201, Unit 1/2 "RCIC Steam Line High Flow Isolation Calibration," will be revised to include quarterly calibration of the associated time delay relays(ATM #23924-14).

# F. PREVIOUS OCCURRENCES

A review of Licensee Event Reports over the previous three years found no previous occurrences of a missed surveillance due to incorrect periodicity requirements.

# G. COMPONENT FAILURE DATA

Since no component failure occurred, this section is not applicable.