

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III

799 ROOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137 DCS/RSB (RIDS) IE OI

November 22, 1985

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

Commonwealth Edison Company ATTN: Mr. Cordell Reed Vice President Post Office Box 767 Chicago, IL 60690

Gentlemen:

Over the past several months, Commonwealth Edison Company's LaSalle County Nuclear Station has experienced numerous events which have degraded safety systems. These events have occurred despite the efforts of Commonwealth Edison Company to improve the regulatory performance of its LaSalle County Nuclear Station.

To aid in our evaluation of the underlying problems, I formed a special task force to perform an in-depth review of the operating history of LaSalle County Station. The task force determined that: (1) plant regulatory performance has historically been poor -- since 1982 there have been thirteen enforcement conferences, numerous management meetings, and the imposition of five civil penalties; (2) certain plant systems experienced problems including equipment failures and/or isolations on a regular basis; (3) problems are evident in the management of the modification program; (4) control of work activities affecting the plant is inadequate; (5) plant operators routinely deal with excessive numbers of work requests, procedure changes, limiting conditions for operation time clocks and Technical Specification abnormal conditions; and (6) many of these same problem areas were previously identified by Commonwealth Edison Company in an onsite review conducted on July 16, 1982. These findings are set forth in the enclosed NRC Task Force Review of Operational History for LaSalle County Station, Units 1 and 2, dated September 24, 1985.

As a result of the task force review, the NRC has concluded that: (1) equipment problems are not being aggressively resolved; (2) planning and control of site activities are not effective; (3) many areas of concern have been identified for which immediate corrective action is necessary; (4) the trequency of personnel errors remains excessive; and (5) the Commonwealth Edison Regulatory Performance Improvement Plan instituted in February 1983 has not resulted in sufficient improved performance at LaSalle County Station.

These evaluations and conclusions demonstrate significant deficiencies in the current management, management structures, and programmatic systems that are in place to control site activities. If left uncorrected and current trends continue, significant safety problems may develop at the LaSalle County Station. Accordingly, to enable us to determine whether or not the LaSalle County Station licenses should be modified, suspended, or revoked, you are requested, pursuant to the provisions of 10 CFR 50.54(f), to evaluate and address the following concerns:

- (1) Adequacy of management, management structures and practices that have contributed to the performance of LaSalle County Station and changes that you have determined are needed to improve this performance.
- (2) Adequacy of the maintenance and modification programs, including criteria for prioritizing modifications and work requests, and changes that you have determined are needed to improve these programs.
- (3) Adequacy of control of work activities in the plant to minimize their impact on operations and changes that you have determined are needed to improve the control of these work activities.
- (4) Adequacy of the implementation of the Regulatory Improvement Plan and any other ongoing corrective actions and changes that you have determined are needed to improve this Plan and these corrective actions.
- (5) Adequacy of the resources committed to the LaSalle County Station and plans you have made to change this resource commitment.

Your response should address actions taken and your plans to improve performance in each of the general areas described above and any other areas you deem appropriate. Your plans should include specific milestones, specific time limits, and measurement criteria for each milestone to accomplish such improvement. Additionally, you response should address the resources that will be committed to accomplish these tasks, and sustain the anticipated improved performance.

Pursuant to 10 CFR 50.54(f), you are requested to furnish, under oath or affirmation, no later than 30 days from the date of this letter, your plans and programs to resolve the concerns identified above. Your plans and programs shall specify actions that will have been completed and goals that will have been accomplished prior to restart of LaSalle Unit 1 from its fall outage. Also, include a schedule for any longer term actions. Specifically, address the number of outstanding work requests, modifications, and procedure

changes that will remain open and your justification of why Unit 1 should be restarted if these items are not current. We are prepared to meet with you in our Region III office in Glen Ellyn, Illinois, to discuss your plans and programs prior to the submittal of your written response and as soon as your program is sufficiently well-defined to make such a meeting useful.

Sincerely,

James G. Keppler
Regional Administrator

Enclosure: Task Force Review of Operational History for LaSalle County Station, Units 1 and 2, dated September 24, 1985

cc w/enclosure:
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