March 4, 2002

Mr John L. Skolds, President Exelon Nuclear Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL. 60555

## SUBJECT: ANNUAL ASSESSMENT LETTER - LASALLE COUNTY STATION (REPORT 373/02-01; 374/02-01)

Dear Mr. Skolds:

On January 30, 2002, the NRC staff completed its end-of-cycle plant performance assessment of LaSalle County Station. The end-of-cycle review for LaSalle County Station involved the participation of all technical divisions in evaluating performance indicators (PIs) for the most recent quarter and inspection results for the period from April 1 through December 31, 2001. This letter is to inform you of our assessment of your safety performance during this period. In addition, we are providing our plans for future inspections at your facility so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections which may conflict with your plant activities.

As discussed in our May 31, 2001 annual assessment letter, this inspection and assessment cycle consisted of three quarters (i.e., the second, third, and fourth calendar quarters of calendar year 2001) instead of the usual four quarters. This change was implemented to align the inspection and assessment cycle with the calendar year beginning on January 1, 2002.

Overall, LaSalle County Station operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for LaSalle Unit 1 for the most recent quarter, as well as the first two quarters of the assessment cycle, was within the Licensee Response Band Column of the NRC's Action Matrix based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (GREEN). However, plant performance for LaSalle Unit 2 for the most recent quarter was within the Regulatory Response Column of the NRC's Action Matrix, based on a single WHITE Performance Indicator for Unplanned Scrams, where feedwater control and human performance issues negatively impacted the initiating events cornerstone.

The LaSalle County Station Unit 2 Performance Indicator for Unplanned Scrams Per 7,000 Critical Hours exceeded the licensee response band Green/White threshold as reported in Exelon's October 2001 performance indicator submittal. Your staff's evaluation identified a number of common causes for the indicator crossing the Green/White threshold including: Corrective actions for known problems were not always completed in a timely manner; compensatory measures were not always effective; risk assessments on occasion resulted in maintenance errors; root cause analysis were not always effective in preventing recurrence; J. Skolds

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personnel performance was not always consistent with expectations (work standards); and the Operating Experience (OPEX) program missed opportunities to prevent events.

In response to the WHITE Performance Indicator, the NRC conducted a Supplemental Inspection (IR 374/2001018). The Supplemental inspection concluded that your staff's assessment was reasonably thorough and the process used to identify the common causes was effective. The Supplemental inspection also concluded that your staff's corrective action, if properly implemented, should prevent recurrence of the conditions

In addition, the NRC staff identified a potential adverse trend in the cross-cutting area of Human Performance. Each human performance error had an adverse impact on safety by increasing the frequency of initiating events, or potentially or actually affecting the reliability, operability, and functionality of a structure, system, or component. Specifically, three Unit 2 reactor scrams were caused by human performance errors; site staff failed to identify material in the suppression pool which represented a potential challenge to ECCS suction strainer performance; chemistry personnel failed to adhere to a sampling procedure causing the offgas pre-treatment radiation monitor to isolate; operator actions, not prescribed in a procedure, caused the Unit 2 Division 2 RHR Service Water system to become inoperable; and operator errors, following the September 3, 2001 reactor scram, adversely impacted plant stabilization. This adverse human performance trend is considered a substantive cross-cutting issue.

The enclosed inspection plan details the inspections scheduled through March 31, 2003. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The last 6 months of the inspection are tentative and may be revised at the Mid-Cycle Review meeting.

In addition to the baseline inspection program, the NRC issued safeguards advisories recommending that nuclear power plant licensees go to the highest level of security immediately following the terrorist attacks on the World Trade Center and the Pentagon, and all promptly did so. With continued uncertainty about the possibility of additional terrorist activities, the Nation's nuclear power plants, including LaSalle County Station, remain at a high level of security. On February 25, 2002, the NRC issued an Order to all nuclear power plant licensees, requiring them to take certain additional interim compensatory measures to address the generalized high-level threat environment. These additional compensatory requirements will provide the NRC with reasonable assurance that public health and safety and the common defense and security continue to be adequately protected in the current generalized high-level threat environment. These requirements will remain in effect pending notification from the Commission that a significant change in the threat environment occurs, or until the Commission determines that other changes are needed following a more comprehensive re-evaluation of current safeguards and security programs. To date, we have monitored LaSalle County Station's actions in response to the terrorist attacks through a series of audits. With the issuance of the Order, we will evaluate LaSalle County Station's compliance with these interim requirements.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made 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 <a href="http://www.nrc.gov/NRC/ADAMS/index.html">http://www.nrc.gov/NRC/ADAMS/index.html</a> (the Public Electronic Reading Room).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Bruce Burgess at 630/829-9629 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Geoffrey E. Grant, Director Division of Reactor Projects, Region III

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

Enclosure: LaSalle County Station Inspection/Activity Plan

cc w/encl: W. Bohlke, Senior Vice President, Nuclear Services C. Crane, Senior Vice President - Mid-West Regional J. Cotton, Senior Vice President - Operations Support J. Benjamin, Vice President - Licensing and Regulatory Affairs R. Hovey, Operations Vice President J. Skolds. Chief Operating Officer K. Jury, Director - Licensing R. Helfrich, Senior Counsel, Nuclear **DCD** - Licensing G. Barnes, Site Vice President M. Schiavoni, Station Manager W. Riffer, Regulatory Assurance Supervisor M. Aguilar, Assistant Attorney General Illinois Department of Nuclear Safety State Liaison Officer Chairman, Illinois Commerce Commission

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## Lasalle Inspection / Activity Plan 03/04/2002 - 03/31/2003

Unit				Planned Dates		Inspection		
Number	Inspection Activity	Title	on Site	Start	End	Туре		
FY 2002 - LASALLE INIT PREP 03/2002 4								
1	W90057	OL - INITIAL EXAM - LASALLE - MAR/APR 2002		03/18/2002	03/22/2002	Not Applicable		
	IP 71114 - BIENN	NIAL EP EXERCISE INSPECTION	3					
1, 2	IP 7111401	Exercise Evaluation		03/18/2002	03/22/2002	Baseline Inspections		
1, 2	IP 71151	Performance Indicator Verification		03/18/2002	03/22/2002	<b>Baseline Inspections</b>		
	HTSINK B - BIENN	NIAL HEAT SINK	1					
1, 2	IP 7111107B	Heat Sink Performance		04/01/2002	04/05/2002	Baseline Inspections		
	FY 2002 - LASA	LLE INIT EXAM 04/2002	5					
1	W90057	OL - INITIAL EXAM - LASALLE - MAR/APR 2002		04/08/2002	04/26/2002	Not Applicable		
		PINSPECTION	1					
1, 2	IP 7112203	Radiological Environmental Monitoring Program		04/29/2002	05/03/2002	Baseline Inspections		
1, 2	IP 71151	Performance Indicator Verification		04/29/2002	05/03/2002	Baseline Inspections		
		CCESS CNTRL & INSTRUMENT INSPECTION	1					
1, 2	IP 7112101	Access Control to Radiologically Significant Areas		08/05/2002	08/09/2002	Baseline Inspections		
1, 2	IP 7112103	Radiation Monitoring Instrumentation		08/05/2002	08/09/2002	Baseline Inspections		
1, 2	IP 71151	Performance Indicator Verification		08/05/2002	08/09/2002	Baseline Inspections		
	MAINT B - BIENN	NIAL MAINTENANCE RULE	1					
1, 2	IP 7111112B	Maintenance Rule Implementation		08/26/2002	08/30/2002	Baseline Inspections		
		TY SYSTEM BIENNIAL (DRS)	6					
1, 2	IP 7111121	Safety System Design and Performance Capability		09/09/2002	09/27/2002	Baseline Inspections		
		GUARDS INSPECTION-AA/AC/PI/PC	1					
1, 2	IP 7113001	Access Authorization Program (Behavior Observation Only)		10/21/2002	10/25/2002	Baseline Inspections		
1, 2	IP 7113002	Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorization		10/21/2002	10/25/2002	Baseline Inspections		
1, 2	IP 7113004	Security Plan Changes		10/21/2002	10/25/2002	Baseline Inspections		
1, 2	IP 71151	Performance Indicator Verification		10/21/2002	10/25/2002	Baseline Inspections		
	IP 71122 - RAD I	MATERIAL PROC/SHIPPING INSPECTION	1					
1, 2	IP 7112202	Radioactive Material Processing and Transportation		11/12/2002	11/15/2002	Baseline Inspections		
	IP 71114 - NON-	EXERCISE BASELINE EP INSPECTION	1					
1, 2	IP 7111402	Alert and Notification System Testing		02/03/2003	02/07/2003	Baseline Inspections		
1, 2	IP 7111403	Emergency Response Organization Augmentation Testing		02/03/2003	02/07/2003	Baseline Inspections		
1, 2	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		02/03/2003	02/07/2003	Baseline Inspections		
1, 2	IP 71151	Performance Indicator Verification		02/03/2003	02/07/2003	Baseline Inspections		
	IP 71122 - LIQ/G	ASEOUS EFFLUENTS INSPECTION	1					
1, 2	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		02/03/2003	02/07/2003	Baseline Inspections		

This report does not include INPO and OUTAGE activities. This report shows only on-site and announced inspection procedures. Page 2 of 2

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## Lasalle Inspection / Activity Plan 03/04/2002 - 03/31/2003

Unit				Planned Dates		Inspection
Number	Inspection Activity	Title	on Site	Start	End	Туре
	IP 71122 - LIQ/0	ASEOUS EFFLUENTS INSPECTION	1			
1, 2	IP 71151	Performance Indicator Verification		02/03/2003	02/07/2003	Baseline Inspections
	MOD50.59 - BIEN	NIAL PLANT MODS AND 50.59	3			
1, 2	IP 7111102	Evaluation of Changes, Tests, or Experiments		03/10/2003	03/14/2003	Baseline Inspections
1, 2	IP 7111117B	Permanent Plant Modifications		03/10/2003	03/14/2003	Baseline Inspections