July 26, 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 50-373/2000009(DRS);
50-374/2000009(DRS)

Dear Mr. Kingsley:

On June 30,2000, the NRC completed a baseline inspection and regional assist inspection at your LaSalle Nuclear Station. The enclosed report presents the results of those inspection activities. The results of this inspection were discussed with Mr. M. Pardee and other members of your staff on June 30, 2000. Please note that the portion of this effort listed as "Regional Assist" was not part of the NRC's new Reactor Oversight Program, rather, as discussed with your staff and our program office, it was a followup to a previously conducted inspection.

The inspection was an examination of activities conducted under your license as they relate to the Safeguards Strategic Performance Area and compliance with the Commission's rules and regulations and with the conditions of your license. Within this area, the inspection consisted of a selected examination of procedures and representative records, observation of activities, and interviews with personnel. Specifically, this inspection focused on performance involving your program for collecting and reporting performance indicator information, physical protection performance indicator verification, and implementation of a revision to the security plan. Additionally, a regional initiative inspection was conducted to evaluate the effectiveness of your recent change in the plant protection strategy.

During 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).

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

Sincerely,

/RA/

James R. Creed
Safeguards Program Manager
Division of Reactor Safety

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

Enclosure: Inspection Report 50-373/2000009(DRS);
50-374/2000009(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
F. Spangenberg, Regulatory Assurance Supervisor
M. Aguilar, Assistant Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission

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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:	50-373/2000009(DRS); 50-374/2000009(DRS)
Licensee:	Commonwealth Edison Company (ComEd)
Facility:	LaSalle Nuclear Station, Units 1 and 2
Location:	2601 No. 21st Road Marseilles, IL 61341
Dates:	June 28-29, 2000
Inspectors:	G. Pirtle, Physical Security Inspector D. Orrik, Reactor Security Specialist, NRR NRC Contractors
Approved by:	James R. Creed, Safeguards Program Manager 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
● Initiating Events	● Occupational	● Physical Protection
● Mitigating Systems	● Public	
● Barrier Integrity		
● Emergency Preparedness		

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

LaSalle Nuclear Power Plant
NRC Inspection Report 50-373/2000009(DRS); 50-374/2000009(DRS)

IR 05000373-00-09; IR 05000374-00-09; on 06/28-29/2000; Commonwealth Edison Company, LaSalle Station, Units 1 and 2; a security specialist report. A regional initiative inspection evaluated the effectiveness of a change to the plant protection strategy.

The inspection was conducted by a regional security specialist, a reactor security specialist from the Office of Nuclear Reactor Regulation, and three NRC contractors.

Cornerstone: Physical Protection

> The licensee's protective strategy provided an effective contingency response force capability (40A5.2).

Report Details

3. SAFEGUARDS

Cornerstone: Physical Protection

PP4. Security Plan Changes (IP 71130.4)

a. Inspection Scope

The inspectors reviewed Revision 61 of the LaSalle Station Physical Security Plan which was submitted by licensee letter, dated February 21, 2000, to verify that the change did not decrease the effectiveness of the security plan. The security plan revision was submitted in accordance with 10 CFR 50.54(p).

b. Findings

An unresolved item was identified. Section 9.6 of Revision 61 to the security plan described measures which would allow certain containers to enter the protected area (PA) without being searched if the containers were searched prior to leaving the PA. These measures do not require the containers to be locked while outside of the protected area, and verification of the seal used to initially seal the containers while outside of the protected area is not required before the containers enter the PA. Additionally, vaguely worded storage and inspection requirements (such as within a "limited access area," and "periodically checked") while outside the PA are not defined in the security plan.

The unresolved item is if the protection requirements for exempting such containers from search are adequate and in accordance with 10 CFR 50.54(p) (URI 50-373/2000009-01; 50-374/2000009-01). The licensee chose to enter this issue into the corrective action program (PIF No. L2000-03703) for tracking purposes, pending final resolution of the issue. Resolution of this issue will be addressed by separate correspondence.

4. OTHER ACTIVITIES

4OA 1 Performance Indicator Verification (IP 71151)

a. Inspection Scope

The inspectors reviewed the licensee's program for the gathering and submittal of data for the Physical Protection Performance Indicators (PI) pertaining to Fitness-For-Duty Personnel Reliability, Personnel Screening Program, and Protected Area Security Equipment. Specifically, a sample of plant reports related to security events, fitness-for-duty reports, and other applicable security records were reviewed.

b. Findings

There were no findings identified during this inspection relating to the submitted data for the Fitness-for-Duty Personnel Reliability, the Personnel Screening Program, or the Protected Area Security Equipment Performance Indicators for the period through the first quarter of 2000.

4OA5 Other

1. Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process"

a. Inspection Scope

The inspectors reviewed the performance indicator data collecting and reporting process for the "Fitness-for-Duty/Personnel Reliability," "Personnel Screening Program," and "Protected Area Security Equipment" performance indicators. This procedure was conducted in conjunction with the performance indicator verification performed per IP 71151, "Performance Indicator Verification," and documented in Section 4OA1 of this report. The review included data collecting and reporting process, definition of terms, calculation method, and consistency with industry guidance document NEI-99-02, Revision 0. The licensee procedures reviewed included:

ComEd procedure RS-AA-122-117, "Performance Indicator-Protected Area Security Equipment Performance Index," Revision 2

ComEd procedure RS-AA-122-118, "Performance Indicator-Personnel Screening Program Performance," Revision 0

ComEd procedure RS-AA-122-119, "Performance Indicator-Fitness-for-Duty (FFD)/Personnel Reliability Program Performance, Revision 0

b. Findings

An unresolved item pertaining to the security equipment performance indicator was identified and relates to not counting equipment compensated for when maintenance does not evaluate the equipment.

Frequently Asked Question (FAQ) 59 for the physical protection area in NEI document 99-02 Revision 0, indicates that protected area equipment compensated for does not have to be counted for performance indicator (PI) purposes if maintenance evaluates the equipment and determines that no maintenance or just minor adjustments are required to return the equipment to service.

The security staff's practice was to not count compensatory measure hours for equipment that exceeds the false alarm criteria identified in the security plan if the equipment is not inactivated, even if maintenance did not evaluate the equipment. The counting of compensatory hours for exceeding false alarm criteria was determined by the security staff solely whether the equipment is inactivated or not. Section 8.4 of the

security plan states that alarm zones that exceed the false alarm criteria are to be considered as "failed." The unresolved item is if compensatory measures for PA intrusion detection equipment considered as failed (as described in the security plan), but not evaluated by maintenance, have to be counted for PI reporting purposes (URI 50-373/2000009-02; 50-374/2000009-02). Resolution of this issue will be addressed by separate correspondence.

The number of compensatory hours that fit into this category would not have changed the protected area security equipment PI performance band for the first quarter of 2000 (green). The licensee chose to enter this issue into the corrective action program (PIF No. L2000-03700) for tracking purposes pending final resolution of the issue.

Except for the unresolved item noted above, the inspectors concluded that the three procedures identified above contained sufficient information for security personnel compiling plant protection data to adequately report the plant protection performance indicators.

2. Miscellaneous Security and Safeguards Issues - Regional Assist (IP 81700)

a. Inspection Scope

The inspectors and NRC contractors toured the protected area, vital areas containing target sets, and selected defensive positions. Plant protection strategy and capabilities were discussed in detail with the licensee's security staff. Identification of the appropriate target sets were discussed with operations and security representatives. Five table top exercises were conducted to evaluate defensive strategies, response team leaders' knowledge of deployment tactics, and operations personnel actions for plant protection purposes. The table top exercises were also used to evaluate any potential vulnerabilities in the plant protection strategy. Two force-on-force exercises were conducted to evaluate the security force's response and deployment capabilities, command and control, fields of fire, redeployment capabilities and tactics, availability and use of equipment, and other factors required to counter the security design basis threat. Exercise controllers performance was observed. The adversary force's tactics were also evaluated during the exercises.

The specific details of the adversary tactics and security force counter tactics and deployment techniques are safeguards information and exempt from public disclosure in accordance with 10 CFR 73.21. Such details are not contained in this report.

b. Findings

The security force demonstrated the capability to effectively implement the plant protection strategy as planned, counter the security design basis threat adversary force, and coordinate effectively with plant operations personnel during the threat period. This inspection effort was not part of the baseline inspection program.

4OA6 Management Meeting

.1 Exit Meeting Summary

The inspectors presented the inspection results to Mr. M. Pardee and other members of licensee management at the conclusion of the onsite inspection on June 30, 2000. The licensee representatives acknowledged the findings presented. When asked by the inspectors, licensee personnel did not identify any information discussed as proprietary or safeguards information, except for specific details pertaining to security force plant protection strategy. Those specific details are considered safeguards information in accordance with 10 CFR 73.21, are exempt from public disclosure, and are not contained in this report.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

M. Pardee, Site Vice President
J. Barichello, Assistant Station Security Administrator
K. Bartes, Nuclear Oversight Manager
B. Bartlett, Assistant Station Security Administrator
V. Gengler, Station Security Administrator
R. Harvey, Training Instructor, TWC
R. Kavinsky, Security Operations Coordinator, The Wackenhut Corporation (TWC)
S.Kirven, District Manager, TWC
K. Kuciuba, Support Services Superintendent
R. Lane, Corporate Security Manager
J. Pollock, System Engineer
B. Saunders, Nuclear Generating Group Security
M. Schiavoni, Acting Plant Manager
S. Shields, Regulatory Assurance
F. Spangenberg, Regulatory Assurance Manager
W. Washkowiak, Training Coordinator, TWC
C. Wilson, Security Force Manager, TWC

NRC

E. Duncan, Senior Resident Inspector, NRC Region III
P. Krohn, Resident Inspector, NRC Region III

ITEMS OPENED AND CLOSED

Opened

50-373/2000009-01	URI	Protective Criteria For Containers Exempt From Search (PP4)
50-374/2000009-01	URI	Protective Criteria For Containers Exempt From Search (PP4)
50-373/2000009-02	URI	Reporting Compensatory Hours For Failed Protected Area Security Equipment (40A5.1)
50-374/2000009-02	URI	Reporting Compensatory Hours For Failed Protected Area Security Equipment (40A5.1)

Closed

None

LIST OF ACRONYMS USED

DRS	Division of Reactor Safety
PA	Protected Area
PI	Performance Indicator
URI	Unresolved Item

LIST OF DOCUMENTS REVIEWED

ComEd procedure RS-AA-122-117, “Performance Indicator-Protected Area Security Equipment Performance Index,” Revision 2

ComEd procedure RS-AA-122-118, “Performance Indicator-Personnel Screening Program Performance,” Revision 0

ComEd procedure RS-AA-122-119, “Performance Indicator-Fitness-For-Duty (FFD)/ Personnel Reliability Program Performance,” Revision 0

Security Event Reports for the Period Between January and June 2000

Revision 61 to the LaSalle Plant Security Plan

PIF No. L2000-03703, “NRC Inspection-Unresolved Item (Revision 61 to Security Plan),” dated July 5, 2000

PIF No. L2000-03700, NRC Inspection - Counting Comp Hours for PI”, dated July 5, 2000

ComEd Nuclear Generation Group S.29 Report for LaSalle Station (Protected Area Security Equipment Performance Index) for Period Between January 1999 Through May 2000

Security Systems Status/Compensatory Measures for Period Between April 1999 and March 2000 (Chart and Graph)