October 24, 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 COUNTY STATION - INSPECTION REPORT 50-373-2000-13(DRP); 50-374-2000-13(DRP)

Dear Mr. Kingsley:

On September 30, 2000, the NRC completed an inspection at your LaSalle County Station. The enclosed report presents the results of that inspection. The results of this inspection were discussed on September 27, 2000, with Mr. C. Pardee and other members of your staff.

The inspection was an examination by the resident inspectors of activities conducted under your license as they relate to reactor safety, verification of performance indicators, event followup, and to compliance with the Commissions 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.

Based on the results of this inspection, the NRC identified one issue that was evaluated under the significance determination process and was determined to be of very low safety significance (Green). This issue involved a violation of NRC requirements. However, the violation was not cited due to the very low safety significance and because it was entered into your corrective action program. This Non-Cited Violation (NCV) is described in the subject inspection report. If you contest this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-001, with copies to the Regional Administrator, Region III; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-001; and the NRC Resident Inspector at the LaSalle facility.

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Sincerely,

/RA/

Bruce Burgess, Chief
Reactor Projects Branch 2

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

Enclosure: Inspection Report 50-373/2000-13(DRP);
50-374/2000-13(DRP)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos:	50-373, 50-374
License Nos:	NPF-11, NPF-18
Report Nos:	50-373/2000-13(DRP); 50-374/2000-13(DRP)
Licensee:	Commonwealth Edison Company
Facility:	LaSalle County Station, Units 1 and 2
Location:	2601 N. 21st Road Marseilles, IL 61341
Dates:	August 12 - September 30, 2000
Inspectors:	E. Duncan, Senior Resident Inspector, LaSalle D. Smith, Senior Resident Inspector, Dresden C. Brown, Resident Inspector, Clinton Power Station B. Dickson, Resident Inspector, Dresden P. Krohn, Resident Inspector, LaSalle
Approved by:	Bruce Burgess, Chief Reactor Projects Branch 2 Division of Reactor Projects

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

IR05000373-00-13, IR05000374-00-13; on 8/12-9/30/2000; Commonwealth Edison Company; LaSalle County Station; Units 1 & 2.

The inspection was conducted by the resident inspectors. The inspection was conducted of the following baseline activities: Equipment Alignment, Fire Protection, Licensed Operator Requalification, Maintenance Rule Implementation, Maintenance Risk/Emergent Work, Operability Evaluations, Operator Workarounds, Post Maintenance Testing, Surveillance Testing, Temporary Plant Modifications, and Performance Indicator Verification. The inspectors also completed Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review," during the inspection period. The inspection identified one GREEN issue which was a Non-Cited Violation. The significance of the issue was determined by the Significance Determination Process.

Cornerstone: Mitigating Systems

- Green. The inspectors completed the assessment of an issue identified in NRC Inspection Report 50-373/2000-11(DRP); 50-374/2000-11(DRP) involving two holes between the Unit 1, Division 1 and Unit 1, Division 2 Essential Switchgear Rooms. A Non-Cited violation was identified because the holes represented a condition where the 3-hour fire barrier requirement of License Condition 25 for LaSalle Unit 1 was not met.

  The issue was of very low safety significance due to the relatively small transient combustible loading in the Essential Switchgear Rooms, the historical effectiveness of the fire brigade, and heat propagation models which demonstrated that in the event of a fire, temperatures inside the Unit 1, Division 2 Essential Switchgear Room breaker cubicles were insufficient to significantly impact breaker operation.

Report Details

Summary of Plant Status: Both units operated at or near full power for the entire inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R04 Equipment Alignment

a. Inspection Scope

The inspectors reviewed documentation and conducted plant walkdowns to verify correct system lineup for the Unit 2 High Pressure Core Spray (HPCS) system with the Unit 2 Reactor Core Isolation Cooling (RCIC) system out-of-service for planned maintenance. These documents included plant procedures, such as abnormal and emergency operating procedures, as well as plant drawings. The inspectors verified critical portions of the redundant or backup system and identified any discrepancies between the existing equipment lineup and the correct lineup.

b. Findings

There were no findings identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors walked down the following risk significant areas to identify fire protection degradations:

- Fire Zone 8B1 - Unit 2 HPCS Diesel Generator Room
- Fire Zone 8B2 - Unit 2 Standby Emergency Diesel Generator (EDG)
- Fire Zone 8B3 - Unit 2 HPCS Diesel Day Tank Room
- Fire Zone 8B4 - Unit 2 Division 2 EDG Day Tank Room

Emphasis was placed on control of transient combustibles and ignition sources; the material condition, operational lineup, and operational effectiveness of the fire protection systems, equipment, and features; and the material condition and operational status of fire barriers used to prevent fire damage or fire propagation.

In particular, the inspectors verified that all observed transient combustibles were being controlled in accordance with the licensee's administrative control procedures. In addition, the inspectors observed the physical condition of fire detection devices, such as overhead sprinklers, and verified that any observed deficiencies did not impact the operational effectiveness of the system. The physical condition of portable fire fighting equipment, such as portable fire extinguishers, was also observed and verified to be

located appropriately, and that access to the extinguishers was unobstructed. Fire hoses were verified to be installed at their designated locations and the physical condition of the hoses was verified to be satisfactory and access unobstructed. The physical condition of passive fire protection features such as fire doors, ventilation system fire dampers, fire barriers, fire zone penetration seals, and fire retardant structural steel coatings was inspected and verified to be properly installed and in good physical condition.

b. Findings

There were no findings identified.

.2 (Closed) Unresolved Item 50-373/20000011-01(DRP): Unit 1 Degraded Fire Barrier.

Issue Description

As discussed in Section 1R05 of NRC Inspection Report 50-373/00-11(DRP); 50-374/00-11(DRP), the inspectors identified a 2.75-inch diameter corebore (hole) in the overhead of the Unit 1, Division 1 Essential Switchgear Room that was not sealed with any fire retardant material. The open corebore contained a 1-inch diameter electrical grounding strap that passed from the overhead of the Unit 1, Division 1 Essential Switchgear Room to the inside of breaker cubicle 1AP02E-4, "'B' Reactor Recirculation Pump," located in the Unit 1, Division 2 Essential Switchgear Room.

Subsequently, licensee personnel discovered a second unsealed penetration in the ceiling of the Unit 1, Division 1 Essential Switchgear Room which penetrated the inside of breaker cubicle 1AP06E-4, "'B' RHR [Residual Heat Removal] Pump," located in the Unit 1, Division 2 Essential Switchgear Room. Both open corebores compromised the 3-hour fire rating between the two safety-related switchgear rooms.

Fire Scenario

Based on these fire barrier degradations, the inspectors postulated a bus 141Y fire in the Unit 1, Division 1 Essential Switchgear Room initiated by either transient combustibles or a fault on bus 141Y which propagated to the cable trays over bus 141Y, resulting in the complete loss of Unit 1, Division 1 alternating current (AC) power. The fire was then postulated to propagate to the Unit 1, Division 2 Essential Switchgear Room potentially affecting the breaker cubicles immediately above the open corebores.

Significance Determination Process Review

The inspectors, in conjunction with Region III fire protection and probabilistic risk assessment experts, assessed the issue utilizing the Significance Determination Process (SDP) as provided in Inspection Manual Chapter 0609, Appendix F. Because the open corebores represented a degradation of a defense-in-depth fire protection element and compromised the 3-hour fire barrier separation requirements for redundant safe shutdown trains, a Phase 2 SDP analysis was performed. This analysis resulted in the classification of the finding as "GREEN." Factors which primarily contributed to this classification included the following:

- Although the corebores were relatively small, because there was no filler material present, the fire barrier degradation was conservatively assumed to be high.

- Since there was no automatic suppression features in the Unit 1, Division 1, and Division 2 Essential Switchgear Rooms, no credit for automatic fire suppression was given. However, the historical effectiveness of the fire brigade resulted in maximum credit for manual fire suppression and detection.

- The relatively small transient combustible loading in the Unit 1, Division 1, and Division 2 Essential Switchgear Rooms allowed the plant-specific Individual Plant Evaluation for External Events (IPEEE) fire ignition frequency of 7.97E-3 to be conservatively utilized.

- The licensee provided heat propagation models which demonstrated that expected temperatures inside the Unit 1, Division 2 Essential Switchgear Room breaker cubicles in the event of a postulated fire in the Unit 1, Division 1 Essential Switchgear Room were insufficient to significantly impact long-term breaker operation. As a result, although both the 1A and 1B RHR pumps along with the Low Pressure Core Spray (LPCS) system were assumed to be affected by the fire scenario, the 1C RHR pump was assumed to not be affected along with the 1B and 1D condensate/condensate booster pumps. Damage to the 1B RHR pump cubicle was assumed to be limited, and action to expeditiously replace the 1B RHR pump motor breaker with the 1C RHR pump motor breaker was credited.

Regulatory Requirement

License Condition 25 for LaSalle Unit 1 required that the fire protection program be implemented and maintained in accordance with the LaSalle Updated Final Safety Analysis Report and NUREG-0519, “Safety Evaluation Report Related to the Operation of LaSalle County Station Units 1 and 2.” Section H.3.4.14, “Unit 1, Division 2 Essential Switchgear Room - Fire Zone 4E3” and Section H.3.4.16, “Unit 1, Division 1 Essential Switchgear Room - Fire Zone 4F1” of the Updated Final Safety Analysis Report, and Section 9.5.2.1, “Fire Barriers and Penetrations,” of NUREG-0519 required that the Unit 1, Division 1 and Unit 1, Division 2 Essential Switchgear Rooms be separated by a fire barrier having a 3-hour rating. The open corebores between the Unit 1, Division 1 and Division 2 Essential Switchgear Rooms were an example where the 3-hour fire barrier requirement of License Condition 25 for LaSalle Unit 1 was not met and was a violation. However, this Severity Level IV violation is being treated as a Non-Cited Violation (NCV 50-373/2000013-01(DRP), consistent with Section VI.A.1 of the NRC Enforcement Policy.

1R11 Licensed Operator Requalification

a. Inspection Scope

The inspectors performed quarterly observations of licensed operator requalification training. On September 11, the inspectors observed licensed operator requalification training simulator scenario SEC-005C-04, which challenged operators with a simulated loss of feedwater heating event. On September 14, the inspectors observed simulator scenario SEG-00G5-13 which challenged operators with a simulated anticipated transient without scram (ATWS). The inspectors verified crew performance in terms of clarity and formality of communication; the ability to take timely action in the safe direction; the prioritizing, interpreting, and verifying of alarms; the correct use and implementation of procedures, including alarm response procedures; timely control board operation and manipulation, including high-risk operator actions; the oversight and direction by the shift manager, including the ability to identify and implement appropriate Technical Specification actions such as reporting and emergency plan actions and notifications; and the group dynamics.

b. Findings

There were no findings identified.

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed the licensee implementation of the maintenance rule requirements, including a review of scoping, goal-setting, and performance monitoring, short-term and long-term corrective actions, and current equipment performance status. The following systems were selected to review:

- Reactor Recirculation
- Emergency Diesel Generator (EDG)
- High Pressure Core Spray (HPCS)

The Reactor Recirculation system was selected based on performance problems and an (a)(1) maintenance rule classification. The EDG and HPCS systems were classified as (a)(2) and were chosen based on their relatively high risk significance. The inspectors independently verified the licensee's implementation of maintenance rule requirements for these systems by verifying that these systems were properly scoped within the maintenance rule; that all failed structures, systems, or components (SSCs) were properly categorized and classified as (a)(1) or (a)(2); that performance criteria for SSCs classified as (a)(2) were appropriate; and that the goals and corrective actions for SSCs classified as (a)(1) were appropriate. The inspectors also verified that issues were identified at an appropriate threshold and entered in the corrective action program.

b. Findings

There were no findings identified.

1R13 Maintenance Risk Assessment and Emergent Work Prioritization

a. Inspection Scope

The inspectors reviewed the licensee's evaluation of plant risk, scheduling, configuration control, and performance of maintenance associated with planned and emergent work activities and verified that scheduled and emergent work activities were adequately managed. In particular, the inspectors reviewed the licensee's program for conducting maintenance risk safety assessments and verified that the licensee's planning, risk management tools, and the assessment and management of online risk were adequate. The inspectors also verified that licensee actions to address increased online risk during periods when equipment was out-of-service for maintenance, such as establishing compensatory actions, minimizing the duration of the activity, obtaining appropriate management approval, and informing appropriate plant staff, were accomplished when online risk was increased due to maintenance on risk-significant SSCs. The following specific activities were reviewed:

- The inspectors reviewed the maintenance risk assessment for work planned for the week of August 28, 2000. This included work associated with the 1A EDG, and the Unit 2 RCIC system.

- The inspectors reviewed the maintenance risk assessment for work planned for the week of September 4, 2000. This included work associated with the Unit 0 EDG cooling water pump; a Unit 1, Division 2 primary containment isolation system voltage regulator; a Unit 1 stator cooling filter housing leak; and a packing leak on the Unit 1 residual heat removal service water heat exchanger inlet valve.

- The inspectors reviewed the maintenance risk associated with Unit 1 work planned for the week of September 25, 2000. This included work associated with the 1A EDG including an EDG cooling water pump discharge relief valve replacement.

b. Findings

There were no findings identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed selected operability evaluations of degraded and non-conforming conditions to ensure that operability was properly justified and the component or system remained available, such that no unrecognized increase in risk had occurred. The following operability evaluations were reviewed:

- OE 95011: Suppression Pool Temperature Monitoring Wiring Discrepancy

This operability evaluation resolved the condition of the suppression pool temperature monitoring (SPTM) system resistance temperature detectors (RTDs) which were not wired as recommended by General Electric (GE). The inspectors reviewed Vendor Manual J-0800, "GE - NUMAC [Nuclear Measurement Analysis and Control] Suppression Pool Temperature Monitor," and a March 13, 1995, GE letter from S. Sawyer, "RTD Connections for the LaSalle SPTM," which documented that the installed wiring configuration would not adversely impact temperature indication since the input RTD amplifier and excitation sources were well isolated, and that there was sufficient low-pass filtering to minimize electromagnetic interference effects.

- OE 96057: Defective RCIC Support Bolting

This operability evaluation analyzed the condition of bolts with inadequate heat-treating installed on RCIC pipe support framing. The inspectors reviewed Cardinal Industrial Products Report, "Investigation and Analysis of Suspect Fasteners Event 29257," dated November 1995, which documented that certain lots of bolts manufactured by the company were not adequately heat treated; Calculation 977, "Mechanical Component Support Subsystem NB-01," Volume 1; and Calculation L-000582, "Assess Use of Potentially Substandard 1-Inch Diameter Bolts During Reassembly of Support M09-NB15-1000R," dated July 11, 1996, which verified that the configuration was sufficient as installed.

- OE 96055: Safety-Related Standby Gas Treatment (SBGT) System High Efficiency Particulate Air (HEPA) Filters Replaced With Nonsafety-Related Filters

This operability evaluation analyzed the use of nonsafety-related air filters on the Unit 2 SBGT system filter train. The inspectors reviewed the procurement specifications for both the safety-related and nonsafety-related filters and verified that no differences existed which could adversely impact SBGT system operability.

b. Findings

There were no findings identified.

1R16 Operator Workarounds

a. Inspection Scope

The inspectors reviewed operator workarounds (OWAs) and operator challenges (OCs) to identify any potential adverse impact on the function of mitigating systems or the ability to implement an abnormal or emergency operating procedure. The following items were reviewed:

- OC 299: Fire Protection Carbon Dioxide (CO2) Storage Tank Compressor Trips

Issue Description: This operator challenge identified that the fire protection CO2 storage tank compressor experienced thermal overload trips on occasion.

The inspectors determined that this problem has been relatively infrequent. A compressor trip due to actuation of the thermal overload had not occurred in calendar year 2000 to date. As a result, the impact of this condition has been minimal.

- OC 313: Switchgear Heat Removal (VX) System Fans Rotate Backwards

Issue Description: This operator challenge identified that the VX system fans rotated backwards when not in operation. The inspectors determined that this problem has been relatively infrequent and that the impact of this condition has been minimal.

- OC 241: Fire Protection (FP) Diesel Oil Transfer Pump Solenoid-Operated Suction Valves Do Not Open

Issue Description: This operator challenge identified that the FP diesel oil transfer pump solenoid-operated suction valve does not open as designed when a transfer pump start signal is received.

The inspectors determined that the problem was of low risk significance since a diesel oil transfer pump suction bypass valve was available to be opened in the event the solenoid-operated suction valve could not be opened. In addition, the inspectors reviewed FP pump diesel oil consumption rates and determined that sufficient time existed to manually transfer diesel oil to the FP pump day tanks.

b. Findings

There were no findings identified.

1R16 Operator Workarounds - Cumulative Effects Assessment

a. Inspection Scope

The inspectors reviewed the cumulative effects of all documented operator workarounds on reliability, availability, and potential for mis-operation of a system; the potential for increasing initiating event frequency or impact on multiple mitigating systems; and the ability of operators to respond in a correct and timely manner to plant transients and accidents.

b. Findings

There were no findings identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

The inspectors reviewed and observed the following post-maintenance testing (PMT) activities associated with risk significant equipment:

- PMT WR 990182798, “2DG01K Procedure: Functional Engine, Diesel Generator”
- PMT WR 990059335, “Functional Cooler, RHR Pump ‘2B’ Seal”
- PMT WR 99020581101, “1DG01K Procedure: Functional Engine, Diesel Generator”

During post-maintenance testing observations, the inspectors verified that the test was adequate for the scope of the maintenance work which had been performed, and that the testing acceptance criteria was clear and demonstrated operational readiness consistent with the design and licensing basis documents. The inspectors also verified that the impact of the testing had been properly characterized during the pre-job briefing; the test was performed as written and all testing prerequisites were satisfied; and that the test data was complete, appropriately verified, and met the requirements of the testing procedure. Following the completion of the test, the inspectors verified that the test equipment was removed, and that the equipment was returned to a condition in which it could perform its safety function.

b. Findings

There were no findings identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors observed surveillance testing on risk-significant equipment and verified that the SSCs selected were capable of performing their intended safety function and that the surveillance tests satisfied the requirements contained in Technical Specifications, the UFSAR, and licensee procedures. During surveillance testing observations, the inspectors verified that the test was adequate to demonstrate operational readiness consistent with the design and licensing basis documents, and that the testing acceptance criteria was clear. The inspectors also verified that the impact of the testing had been properly characterized during the pre-job briefing; the test was performed as written and all testing prerequisites were satisfied; the test data was complete, appropriately verified, and met the requirements of the testing procedure; and that the test equipment range and accuracy was consistent with the application, and the calibration was current. Following the completion of the test, the inspectors verified that the test equipment was removed, and that the equipment was returned to a condition in which it could perform its safety function.

The following surveillance testing activities were observed:

- LaSalle Operating Surveillance (LOS) RI-Q5, "Unit 1 Reactor Core Isolation Cooling System Pump Operability and Valve Inservice Tests In Conditions 1, 2, 3 and Cold Quick Start," Revision 13

- LOS-SC-Q1, "Unit 2 SBLC [Standby Liquid Control] Pump and Motor-Operated Valve Operability/Inservice Test and Explosive Valve Continuity Check," Revision 15

- LOS-DC-Q2, "Battery Readings for Unit 1 Safety-Related 250 VDC and Division 1, 2, 3, 125 VDC Batteries," Revision 17

- LOS-DG-Q1, "0 DG Auxiliaries Inservice Test," Revision 34

- LOS-RH-Q1, "RHR [Residual heat Removal] (LPCI) and RHR Service Water Pump and Valve Inservice Test For Operational Conditions 1, 2, 3, 4, and 5, Attachment 2B and 2E," Revision 47

b. Findings

There were no findings identified.

1R23 Temporary Plant Modifications

a. Inspection Scope

The inspectors reviewed Temporary Modification 9900330 which was installed to address a Unit 1 stator cooling filter housing through-wall leak. A failure of the filter housing during normal operation could result in a significant plant transient and a potential reactor scram. The temporary modification initially consisted of a metal patch, was upgraded to a furmanite band when the leakage increased, was revised to add support bars on the top of the housing to address excessive vibration on the filter housing skid, and was again revised to completely encase the filter housing in a fabricated casing welded to the skid floor. The inspectors reviewed the temporary modification package, including the 10 CFR 50.59 safety evaluation; planned post-maintenance testing; and WR 9900330 which installed the temporary modification. The inspectors also reviewed LaSalle Abnormal Operating Procedure (LOA) GC-101, "Unit 1 Stator Cooling Filter Abnormal," Revision 1, and verified that the temporary modification did not adversely impact LOA-GC-101 or other operating procedures.

b. Findings

There were no findings identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. Inspection Scope

The inspectors reviewed reported 2nd quarter data for the Unit 1 and Unit 2 Residual Heat Removal (RHR) and High Pressure Core Spray (HPCS) systems unavailability performance indicator. The inspectors utilized the performance indicator definitions and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Indicator Guideline," Revision 0.

The inspectors reviewed Licensee Event Reports, operator log entries, maintenance rule functional failures, and out-of-service logs for periods of RHR and HPCS system unavailability. The inspectors verified that planned and unplanned unavailability hours were characterized correctly in determining performance indicator results. The inspectors also verified performance indicator data through independent calculations.

During a review of Unit 1 HPCS system unavailability data, the inspectors identified a non-conservative calculation error. Specifically, an inaccurate availability restoration time was utilized following the performance of LIS-HP-105, "Unit 1 High Pressure Core Spray Minimum Flow Bypass Calibration," on May 1, 2000. As a result, the total Unit 1 HPCS system unavailability for the 2nd quarter of 2000 was under-reported by about 4.4 hours. This increased the unavailability from 0.34 percent to 0.37 percent. Since the green/white threshold for this indicator was 1.5 percent and was not exceeded following correction of the error, this discrepancy was considered to be minor. This issue was entered into the licensee's corrective action program as Condition Report (CR) L2000-04891.

During a review of CRs associated with system unavailability, the inspectors discovered that another 2nd quarter reporting error was identified by licensee personnel and documented in CR L2000-04879. In this case, about 4 hours of Unit 1 RCIC unavailability time was not reported when the system was out-of-service from May 12 through May 13, 2000. This increased the system unavailability from 3.94 percent to 3.96 percent. Since the green/white threshold for this indicator was 4.0 percent and was not exceeded, this discrepancy was also considered to be minor.

b. Findings

There were no findings identified.

4OA5 Performance Indicator Verification - Temporary Instruction 2515/144

a. Inspection Scope

The inspectors utilized Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review," to determine whether licensee personnel were appropriately implementing NRC and industry guidance. The intent of this

temporary instruction was to review and determine whether licensee personnel had a clear understanding of the indicator definitions, data reporting elements, calculational methods, definitions of terms, and clarifying notes and a process that produced accurate performance indicators in accordance with the guidelines of NEI-99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0. The inspectors utilized the performance indicator definitions and guidance contained in NEI 99-02, Revision 0, for the following PIs:

- Initiating Events - Unplanned Power Changes per 7000 Critical Hours
- Mitigating Systems - Safety System Unavailability (SSU) for the Following Systems:
  - Emergency Diesel Generators
  - High Pressure Core Spray
  - Reactor Core Isolation Cooling
  - Residual Heat Removal
- Mitigating Systems - Safety System Functional Failures

The inspectors reviewed RS-AA-122, "Regulatory Assurance Performance Indicator Review Process," Revision 2, and applicable attachments for the performance indicators listed above. For each performance indicator, the inspectors compared the RS-AA-122 procedure attachment with the guidance contained in NEI-99-02. The inspectors verified that the data collecting and reporting methods, indicator definitions, data reporting elements, risk thresholds, electronic data reporting protocol, and calculational methods described in the respective performance indicator procedure attachments were consistent with NEI-99-02 guidance. The inspectors also reviewed selected August 2000 control room logs and observed portions of emergency diesel generator surveillance testing activities to determine whether unavailability hours were being properly recorded.

b. Findings

There were no findings identified.

4OA6 Meetings

Exit Meeting Summary

The inspectors presented the inspection results to Mr. C. Pardee and other members of licensee management on September 27, 2000. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

ComEd

C. Pardee, Site Vice President
J. Meister, Station Manager
D. Bost, Site Engineering Manager
R. Gilbert, Operations Manager
W. Riffer, Regulatory Assurance Manager
J. Pollock, System Engineering Manager
F. Gogliotti, Design Engineering Supervisor
T. Gierich, Work Control Manager
J. Henry, Shift Operations Superintendent

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-373/2000013-01	NCV	3-Hour Fire Barrier Degradation

Closed

50-373/20000013-01	NCV	3-Hour Fire Barrier Degradation
50-373/20000011-01	URI	3-Hour Fire Barrier Degradation

Discussed

None