



Commonwealth Edison
Braidwood Nuclear Power Station
Route #1, Box 84
Braceville, Illinois 60407
Telephone 815/458-2801

February 16, 1990
BW/90-0181

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Dear Sir:

The enclosed Licensee Event Report from Braidwood Generating Station is being transmitted to you in accordance with the requirements of 10CFR50.73(a)(2)(i) which requires a 30-day written report.

This report is number 90-002-00; Docket No. 50-456.

Very truly yours,

R. E. Querio
Station Manager
Braidwood Nuclear Station

REQ/JDW/jfe
(7126z)

Enclosure: Licensee Event Report No. 90-002-00

cc: NRC Region III Administrator
NRC Resident Inspector
INPO Record Center
CECo Distribution List

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PDR ADDCK 05000456
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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Braidwood 1 Docket Number (2) 0150000456 Page (3) 1 of 04

Title (4)

Failure to Verify Three Containment Penetrations as a Result of Programmatic Deficiency

Event Date (5)			LER Number (6)			Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)
01	19	90	90	002	00	01	20	90	None	015000011

OPERATING
MODE (9)THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR
(Check one or more of the following) (i)

POWER LEVEL (10)	1	0	0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
				20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
				20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	Other (Specify
				20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	in Abstract
				20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	below and in
				20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	Text)

LICENSEE CONTACT FOR THIS LER (12)

Name P. Law, HPES Coordinator Ext. 2957 TELEPHONE NUMBER
AREA CODE 815 458 - 2801

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURE	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURE	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

Expected Submission Date (15) Month Day Year

Yes (If yes, complete EXPECTED SUBMISSION DATE) X NO

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 9, 1988 a Modification Request was initiated to alter three spare Unit 1 Containment Penetrations. The Modification was processed in accordance with procedures. On June 29, 1989 the Station Checklist identified that the only procedures affected were the Local Leakrate Testing (LLRT) procedures. It was not identified that the flanges should be added to Braidwood Operating Surveillance, Unit One Primary Containment Integrity Verification of Outside Containment Isolation Devices. On November 22, 1989 the LLRTs for the flanges were performed and the results were acceptable. On November 24, 1989 the system was declared operational. On January 19, 1990 an NRC Inspection Team performing a review of Station modification packages recommended that the System Technical Engineer verify that the flanges had been added to the applicable procedures. The root cause of the event was a programmatic deficiency. The existing program provided for determination of procedures that were affected and provided no guidance on how the determination was to be made. The corrective actions verified the flanges in place, and included procedural and administrative controls to prevent recurrence of the event. There have been no similar occurrences.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)					Page (3)		
		Year	Sequential Number	Revision Number					
Braidwood 1	0 5 0 0 0 4 5 6	9 0	-	0 0 2	-	0 0	0 2	Of	0 4

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

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: Braidwood 1; Event Date: January 19, 1990; Event Time: 1445;
 Mode: 1 - Power Operation; Rx Power: 100%;
 RCS [AB] Temperature/Pressure: NOT/NOP

B. DESCRIPTION OF EVENT:

There were no systems or components inoperable at the beginning of the event which contributed to the severity of the event.

On November 9, 1988 a Modification Request was initiated to alter three spare Unit 1 Containment Penetrations [NH]. The proposed modification was to remove the existing welded plates and install blank flanges. This would permit station personnel to route lines from the Auxiliary Building [NF] to the Containment for maintenance and testing activities during unit outages.

The Modification received initial approval and was processed in accordance with Station and Company modification programs and procedures. Part of this process was the completion of form BwAP 1610-T1, Station Checklist. This form provided for verification that Documents, Programs and Procedures that were affected by the modification were identified and the changes initiated as required prior to installation of the modification.

On June 29, 1989 the Station Checklist for this Modification was completed by the System Technical Engineer (STE)(Non-licensed Engineer). The only procedures that were identified as being affected were the local leakage rate testing (LLRT) procedures. It was not identified that the flanges should be added to procedure 1BwOS 6.1.1.a-1, Unit One Primary Containment Integrity Verification of Outside Containment Isolation Devices. This procedure documents performance of Technical Specification 4.6.1.1.a which requires that Containment penetration flanges be verified in place once per 31 days when the unit is in modes one thru four.

On November 21, 1989 during the Unit's first refueling outage the modification installation was completed.

On November 22, 1989 the LLRTs for the flanges were performed and the results were acceptable.

On November 24, 1989 the system was declared operational.

On December 4, 1989 the Unit entered Mode 4 as part of the return to Power Operation from the refueling outage.

On January 19, 1990 an NRC Inspection Team performing a review of Station modification packages recommended that the STE should verify the flanges had been added to the applicable procedures. The STE identified that the flanges had not been added to 1BwOS 6.1.1.a-1 and immediately initiated a Temporary Procedure Change to add the flanges to the procedure.

At 1445 the STE requested assistance from Station Regulatory Assurance Department Personnel (Licensed Senior Reactor Operator) to determine if a Deviation Report was required for this event. Based on the LLRT performance date and the current plant mode it was determined that Technical Specification 4.6.1.1.a. should have been performed for the flanges on or before December 31, 1989, and as a result a Licensee Event Report would be required.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

The STE immediately initiated a Deviation Report and notified the Station Control Room Engineer (Licensed Senior Reactor Operator Control Room Supervisor).

At 1520 the penetrations were declared inoperable and the Technical Specification Action Statement was entered and complied with.

At 1610 the flanges were verified in place and the Action Statement was exited.

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

C. CAUSE OF EVENT:

The root cause of the event was a programmatic deficiency. The existing program provided for STE determination of procedures that were affected and provided no guidance on how the determination was to be made. While in this event the STE had several informal discussions with personnel in other departments regarding the modification, the programmatic weaknesses of placing the determination responsibility solely on the STE and providing no guidance for making that determination created the error.

D. SAFETY ANALYSIS:

This event had no effect on the safety of the plant or the public. The flanges were verified in place during performance of the LLRTs on November 22, 1989 prior to the modification being declared operable and again on January 19, 1990. The modification program's "Users Walkdown Checklist" and Nuclear Work Request (NWR) post maintenance testing programs provide verification that modifications are properly installed prior to their being declared operable. The pre-maintenance requirements and approvals of the NWR program provide assurance that important structures are not altered except as provided for in Technical Specifications.

Even under worse case conditions the multiple protection barriers provided by the administrative programs specified above would preclude any credible containment penetration flange removal event from occurring.

E. CORRECTIVE ACTIONS

The flanges were verified in place.

BwOP 1610-T1 has been revised to include the following:

1. A list of procedure blocks whose departmental representatives are required to be contacted for evaluation of the modification's impact on their respective procedures.
2. Signoff that the identified procedure revisions have been initiated.
3. Listing of any Temporary Procedure Changes by number that are being used in the interim if any required permanent revision is not completed prior to the modification being Operations Approved.

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E. CORRECTIVE ACTIONS (Con't)

Additionally, the Technical Staff Supervisor has issued a directive for Safety Related or Technical Specification related modifications. A written description of the modification will be provided to each departmental representative for procedure blocks specified in BwAP 1610-T1. As a part of this written description, written confirmation from the departmental representative acknowledging that the review will be required. This directive will be evaluated for inclusion into permanent procedures. This action will be tracked to completion by action item 456-200-90-00401.

A training tailgate session will be conducted for appropriate station personnel regarding this event. Included in this training will be discussions on the various methods for identifying potentially affected procedures including computer word search techniques which are currently available at the Station. This action will be tracked to completion by action item 456-200-90-00402.

F. PREVIOUS OCCURRENCES:

No previous similar occurrences.

G. COMPONENT FAILURE:

This event was not the result of component failure, nor did any components fail as a result of this event.