



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 5, 1993

Director, Office of Resource Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-456/92025; 50-457/92025
NRC Docket Numbers 50-456 and 50-457

Reference: B. Clayton letter to C. Reed
dated February 4, 1993, transmitting
NRC Inspection Reports 50-456/92025; 50-457/92025

Enclosed is Commonwealth Edison Company's (CECo) response to the Notice of Violation (NOV) which was transmitted with the referenced letter and Inspection Report. The NOV cited a Severity Level IV violation requiring a written response. CECo's response is provided in the attachment.

If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer, at (708) 663-7285.

Sincerely,

D. L. Farrar
Nuclear Regulatory Services Manager

Attachment

cc: A. Bert Davis, NRC Regional Administrator - RIII
J. Hickman, Project Manager - NRR
S. Du Pont, Senior Resident Inspector

ZNL0/2537/1

JE01

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 50-456/92025; 50-457/92025

VIOLATION (456(457)/92025-01):

10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," Criteria XVI, "Corrective Action," requires, in part, that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, on November 30, 1992, it was identified that corrective actions associated with Licensee Event Report 456/90014 had not been implemented in a timely manner.

REASON FOR THE VIOLATION:

CECo acknowledges the violation which resulted from not implementing the corrective action for Licensee Event Report (LER) 456/90014 in a timely manner. The corrective action was to develop and implement a formal methodology to facilitate restoration of components to operable status in those cases where completion of a work package must be deferred until a later date. Braidwood Station's Operations Department personnel inappropriately assumed that this methodology would be incorporated into the Electronic Work Control System (EWCS) which was being developed.

EWCS was expected to be available by April 1991, and later by December 1991. Implementation of EWCS was further delayed to June 1992, and then again to July 1993. Over this time period, numerous personnel changes (both individual contributor and supervisor) occurred in the Operations Department. These changes contributed to a lack of understanding of EWCS capabilities. It is evident that EWCS, which is now expected to be available by September 1993, will not specifically address the corrective action for the LER. However, EWCS will be utilized as a tracking mechanism which will aid in identifying open work packages.

This event occurred in September 1990. Since that time, Braidwood Operations management has promoted a conservative philosophy regarding restoration of equipment to operable status prior to completion of a work package. As a normal practice, work packages are closed prior to returning equipment to operable status. It is in rare cases that equipment is made operable without completion of a work package. Currently, no formal policy exists regarding restoration of equipment to operable status prior to completion of a work package. In these instances, Operations senior management acknowledges its responsibility to provide Operations shift personnel with sufficient justification to make the determination that the equipment is operable.

For cases in which operability determination of a safety-related component or system is difficult or uncertain, senior management can direct that Braidwood Administrative Procedure (BwAP) 330-1C, "Operability Determination of Safety-Related Equipment," be performed. This procedure has been effectively implemented when appropriate.

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 50-456/92025; 50-457/92025 (continued)

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Since November 1992 and prior to identification of the violation, Braidwood Station was in the process of reviewing outstanding corrective actions over eighteen months old for plant events. This review was to identify any changed circumstances for the commitments, to affirm the expected completion dates, and to emphasize to the cognizant individuals the importance of completing the commitments. This review resulted in the disposition of a number of outstanding commitments, causing an overall reduction in the number of open commitments. The commitment identified in the violation was part of the review; however, it had not yet been investigated. Upon inquiry of the commitment by the Resident Inspector, the Inspector was told about the on-going review. This commitment review has since been completed.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

To more appropriately address the response to the corrective action for LER 456/90014, Operations senior management will formally establish a department policy regarding restoration of equipment to operable status prior to completion of a work package. Once established, this policy will be communicated, and management's expectations will be reinforced to all appropriate Operations personnel by senior Operations management through tailgate meetings. This policy and the associated tailgate meetings will be completed by April 6, 1993.

Although Braidwood Station believes that this is an isolated incident, Braidwood will vigilantly continue to evaluate the timeliness and effectiveness of corrective actions.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved upon completion of the tailgate meetings communicating the Operations policy to the appropriate personnel.