



Commonwealth Edison
Braidwood Nuclear Power Station
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Telephone 815/458-2801

April 20, 1994
SVP/94-024

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

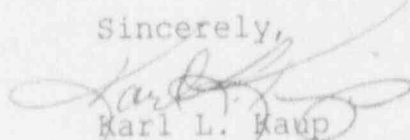
Subject: Braidwood Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-456/94006; 457/94006
NRC Docket Numbers 50-456 and 50-457

Reference: J. A. Grobe letter to S. Berg dated
March 21, 1994 transmitting
NRC Inspection Report
50-456/94006; 50-457/94006

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 three Severity Level IV violations 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 Kevin Bartes, Braidwood Regulatory Assurance Supervisor, at (815)458-2801, extension 2980.

Sincerely,


Karl L. Kaup
Site Vice President
Braidwood Station

SMB/JML/mr

Attachments

cc: J. B. Martin, NRC Regional Administrator - RIII
R. R. Assa, Project Manager - NRR
S. G. Du Pont, Senior Resident Inspector

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 50-456/94006; 50-457/94006

VIOLATION (456(457)/94006-01):

10 CFR 50.72 states, in part, that the licensee shall notify the NRC of any declarations of the Emergency Classes specified in their approved emergency plan.

The Generating Station Emergency Plan (GSEP), Section 5.4, states that the Emergency Classification shall be reported to the NRC Operation Center.

Contrary to the above, on December 2, 1993, the licensee notified the NRC Headquarters Operations Officer of the loss of station communications but did not adequately notify the NRC of the declaration of the Unusual Event.

REASON FOR THE VIOLATION:

The Unit Supervisor that made the NRC notification correctly declared the Unusual Event as required; however, the Unit Supervisor failed to specifically state that an Unusual Event had been declared when contacting the NRC due to cognitive error.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The Unit Supervisor subsequently communicated to the NRC that an Unusual Event had been declared when the NRC called back questioning the event classification.

This event and the importance of declaring the event classification was discussed with the Unit Supervisor.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

Braidwood Emergency Implementing Procedure (BwZP) 200-1, "Braidwood Emergency Action Levels," properly classifies loss of communication capabilities as an Unusual Event. BwZP 1000-1A1, "Unusual Event Checklist," appropriately describes notification of the NRC Operations Center of an Unusual Event. Braidwood Administrative Procedure (BwAP) 1250-6, "Reportable/Potentially Significant Event Screening and Notification," provides a procedure for NRC event notification. Based on the procedures in place and the reason for the violation, no further corrective actions are necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on December 2, 1993, when the Unit Supervisor verified with the NRC that the Station was in fact in an Unusual Event.

VIOLATION (456(457)/94006-02):

10 CFR Part 50.54(q) requires that a licensee authorized to possess and occupy a nuclear power plant shall follow and maintain in effect emergency plans which meet the standards in 10 CFR Part 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

The Generating Station Emergency Plan (GSEP), Section 8.2.1, states, in part, that emergency response personnel receive training appropriate to their positions in accordance with the approved Emergency Preparedness Training (EPT) matrix.

The Emergency Preparedness Training (EPT) Administrative and Course Management Information (ACMI), EPGR-TR-0201, Attachment A, Emergency Preparedness training (EPT) matrix, Paragraph C, states, in part, successful completion of an examination covering the objectives in EP lesson plans for annual "Continuing Training is required", i.e. annual EP requalification.

ACMI describes the procedures and requirements for maintaining the EP training program. ACMI, Paragraph C., states, in part, that examinations are written, approved, and administered as required per station procedures.

Contrary to the above, as of January 1, 1993, the required annual emergency preparedness training requalification examinations were not being written, approved or administered as required per the ACMI.

REASON FOR THE VIOLATION:

The GSEP trainer changed the GSEP requalification test format from a written, multiple choice examination to an oral, constructed-type response examination to more effectively challenge individuals in the examination process. This examination process emphasizes the understanding of concepts and relationships in lieu of memorization of facts. With this methodology, the trainer can better determine the depth of an individual's knowledge; therefore, the trainer can more readily identify and correct knowledge deficiencies. The trainer, however, failed to revise the ACMI to reflect this new testing methodology.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Examinations for GSEP requalification will be administered as described in the existing ACMI until the oral examination process is formalized. Written requalification examinations were administered during the first quarter of 1994.

The Services Director and Training Supervisor discussed the importance of implementing the appropriate procedure revisions when implementing training improvements with the GSEP instructor and Training Department Group Leaders. The discussion also included the importance of following procedures.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

The Training Department Group Leaders will discuss with each instructor the expectation that training improvements cannot be initiated until the appropriate procedure revisions are reviewed and approved. The expectation of procedure adherence will also be reiterated during the discussions. This action will be completed by April 30, 1994.

Training Department Instructions on exam preparation, administration and security will be revised to provide guidance on administering and documenting oral examinations. This action will be completed by June 30, 1994.

The Emergency Preparedness Training ACMI (TDI-130-01) will be revised to provide flexibility in administering oral examinations. This action will be completed by June 30, 1994.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by June 30, 1994, when all GSEP participants will be examined in accordance with the ACMI and the referenced department instructions will be revised.

VIOLATION (456(457)/94006-03):

10 CFR Part 50, Appendix E, Section F.5, states that all training including exercises, shall provide for formal critiques in order to identify weak or deficient areas that need correction.

Contrary to the above, as of January 1, 1993, no formal critiques were provided after annual requalification emergency preparedness training was conducted by the Emergency Preparedness trainer to identify any potential weak or deficient areas that would need correction.

REASON FOR THE VIOLATION:

Critiques of training were traditionally conducted only by the participants of the annual GSEP exercise. Following the actual application of the training during the exercise, individuals were requested to provide feedback on the adequacy of training. This feedback method typically provides more meaningful information than requesting feedback following a training session in which the individual has not yet had the opportunity to apply the training in practical applications.

Braidwood Station considered this practice to meet the requirements of 10 CFR Part 50 Appendix E, Section F.5.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Formal critiques on job-specific training are requested from emergency personnel following training. This process was implemented for job-specific training conducted in the first quarter of 1994.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

The applicable ACMIs will be revised to expand the training critiques from only following the annual GSEP exercise to following all emergency response demonstrations. This action will be complete by June 30, 1994.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by June 30, 1994, when the applicable ACMIs will be revised.