



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

April 29, 1994
BW/94-0070

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 in accordance with the requirement of 10CFR50.73 (a)(2)(i)(B), which requires a 30-day written report.

This report is number 94-006-00, Docket No. 50-456.

K. L. Kofron
Station Manager
Braidwood Station

Encl: Licensee Event Report
No. 456/94-006-00

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

030130

9405040245 940429
PDR ADOCK 05000456
S PDR

JE22

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)
Braidwood 1DOCKET NUMBER (2)
05000456PAGE (3)
1 OF 4TITLE (4)
Missed Technical Specification Surveillance Due to Personnel Error and Programmatic Deficiencies

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 NAME	DOCKET NUMBERS
03	30	94	94	-- 006 --	00	04	29	94	Braidwood 2	05000457
									None	DOCKET NUMBER

OPERATING MODE (9)		6		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)			
POWER LEVEL (10)		000		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	
				20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)	
				20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)			
				20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

NAME
J. Tidmore, System EngineeringTELEPHONE NUMBER (Include Area Code)
(815) 458-2801 x2299

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).				EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
x NO								

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

At 1415 on 03/30/94, it was discovered that the Braidwood Cooling Lake Hydrographic Survey, an 18-month surveillance to verify the depth of the Essential Service Cooling Pond (ESCP), was not completed within the required time. The root cause of the event was a personnel error. The System Engineer stated that it was his understanding that the Surveillance must be started prior to the due date and completed as soon as possible. Also, windy conditions which are typical during the fall/winter make performance of the Surveillance difficult because wave action causes erratic bottom readings. A contributory cause was a programmatic deficiency. The document used to track surveillances was updated with the start date and this was interpreted as a completion acknowledgement. The Surveillance was completed within the 24 hour surveillance period extension allowed in the Technical Specifications. It is planned to have all surveillance packages reviewed and filed with surveillance tracking personnel. There have been previous occurrences of missed Technical Specification Surveillances associated with personnel errors

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)
Braidwood 1		05000456		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
				94	-- 006 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: Braidwood 1; Event Date: March 30, 1994;
Event Time: 1415;
Mode: 6; Rx Power: 000%;
RCS [AB] Temperature/Pressure: 62 degrees F / 12 psig;

Unit: Braidwood 2; Event Date: March 30, 1994;
Event Time: 1415;
Mode: 1; Rx Power: 100%;
RCS [AB] Temperature/Pressure: NOT/NOP

B. DESCRIPTION OF EVENT:

At 1415 on 03/30/94, it was discovered that periodic surveillance BwVS 7.5.2-1, Braidwood Cooling Lake Hydrographic Survey, had not been completed within the allowable surveillance time. The surveillance was last successfully completed on 04/06/92. This resulted in the new due date of 10/08/93 with an allowable completion date (critical date) of 02/22/94 utilizing the approved 25% surveillance extension period.

The surveillance was started on 10/7/93, but was not completed within the allowed frequency time. The System Engineer believed that the surveillance must be started by the due date, but did not understand that it must be completed by the critical date of 2/22/94.

The Surveillance Tracking System (GSRV) did not recognize the incomplete surveillance because the GSRV tracking document was updated to show a starting date of 10/7/93. This was taken as a completion acknowledgement by the clerk entering the data in GSRV. The surveillance was, therefore, shown as completed on 10/7/93 in the GSRV tracking.

The surveillance requires the System Engineer (non-licensed) to take depth readings of the Essential Service Cooling Pond (ESCP) at 100 ft. intervals, over the entire ESCP, using a depth finder with a chart recorder. Windy conditions made performance of the surveillance difficult because it is difficult to maintain the boat's course across the ESCP. The wave action also causes erratic bottom readings which are very difficult to interpret in the charts.

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

NRC FORM 366A
(5-92)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95LICENSEE EVENT REPORT (LER)
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Braidwood 1	05000456	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
		94	-- 006 --	00
				3 of 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

C. CAUSE OF THE EVENT:

The root cause of the event was a personnel error. The System Engineer stated that it was his understanding that the Surveillance must be started prior to the due date. The System Engineer did not realize that the surveillance had to be completed prior to the critical date. Also, this was aggravated by the existing weather conditions during the fall and winter.

A contributory cause was a programmatic deficiency. The Surveillance Tracking System (GSRV) did not recognize the incomplete surveillance because the GSRV tracking document was updated to show a starting date of 10/7/93, and this was taken as a completion acknowledgement.

D. SAFETY ANALYSIS:

This event had no effect on plant or public safety. The Hydrographic Survey is performed to verify the depth of the Essential Service Cooling Pond. The minimum depth ensures enough cooling water is available to safely shutdown the plant in the event of dike failure. The ESCP is still deep enough to remain operable and has not measurably changed depth since the initial performance.

E. CORRECTIVE ACTIONS:

The surveillance was completed within the 24-hour surveillance period extension allowed in Technical Specification 4.0.3. At 1500 on March 30, 1994, the System Engineer began completion of the surveillance. The surveillance was completed on March 31, 1994 at 1225. The average elevation of the ESCP bottom was 583.26 ft. which is well below the 584 ft. minimum elevation required by Tech Specs.

NRC FORM 366A
(5-92)

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4 OF 4				

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The surveillance packages for Operations and Fuel Handling are now being reviewed and filed with the surveillance tracking personnel. Also, the surveillance packages currently processed by System Engineering are being reviewed and filed with the surveillance tracking personnel. This will eliminate the potential for interpreting a start date for a completion date. It is planned to have all surveillance packages reviewed and filed with the surveillance tracking personnel. This action will be tracked to completion by action item 456-180-94-00601.

F. PREVIOUS OCCURRENCES:

There have been previous occurrences of missed Technical Specification Surveillances associated with personnel errors associated with the GSRV process. This does not constitute an adverse trend in that the events involved different systems and methods of discovery.

<u>LER NO.</u>	<u>TITLE:</u>
50-456/93-005	LER 1-93-005; MISSED TECHNICAL SPECIFICATION SURVEILLANCE
50-457/93-004	LER 2-93-004; CORE REACTIVITY NORMALIZATION SURVEILLANCE FOR UNIT 2 CYCLE 4 NOT PERFORMED IN REQUIRED TIME FRAME
50-457/93-005	LER 2-93-005; MISSED SURVEILLANCE ON CONTAINMENT ISOLATION VALVE

G. COMPONENT FAILURE DATA:

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