



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 29, 1993

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. 50-456/93005; 457/93005
NRC Docket Numbers 50-456 and 50-457

Reference: C.D. Pederson letter to C. Reed dated
March 30, 1993 transmitting
NRC Inspection Report
50-456/93005; 50-457/93005

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, Regulatory Performance Administrator at (708) 663-7285.

Sincerely,

D.L. Farrar
Nuclear Regulatory
Services Manager

Attachment

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

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ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 50-456/93005; 50-457/93005

VIOLATION (456(457)/93005):

Technical Specification 6.8.4.c requires that a program for monitoring secondary water chemistry to inhibit steam generator tube degradation shall be established, implemented, and maintained to measure the values of the critical parameters.

Procedure BwCP PD-4, "Braidwood Station Secondary Water Chemistry Surveillance Program," requires sampling of selected components of the secondary water system by in-line monitors to minimize local corrosion in the steam generators and other selected components.

Nuclear Operations Directive NOD-CY.8, "Nuclear Operations In-Line Chemistry Instruments Quality Control Program Manual," requires a quality control program, described therein, be implemented to give a reasonable assurance of the accuracy of the information provided by in-line chemistry instruments and validity of the data.

Procedure BwCP 510-7, "Process Sample Panel Performance Check," implements the quality control program performance checks required in NOD-CY.8 for the secondary system in-line chemistry instruments, including acceptance ranges.

Contrary to the above, performance checks on the in-line chemistry instruments had not been performed as required since about October 1992.

REASON FOR THE VIOLATION:

Braidwood acknowledges that the Chemistry Department did not adhere to the requirements of NOD-CY.8, "Nuclear Operations In-Line Chemistry Instruments Quality Control Program Manual," and BwCP 510-7, "Process Sample Panel Performance Check." Specifically, performance checks were not fully conducted for two out of the seven types of in-line instruments. Performance checks that were done were not in accordance with the NOD and BwCP 510-7. Braidwood was in the process of developing statistically-based acceptance criteria for these instruments to substitute for the acceptance criteria specified in the NOD. However, the process was not properly administered, and changes to the program were not promptly reflected in approved procedures.

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Braidwood believes that actions were in place to minimize the significance of this situation. These actions included Unit Chemists' review of in-line instrument data on a routine basis for reasonableness using cross-checks from other data, and Instrument Maintenance Department periodic calibration of in-line instruments.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Braidwood Chemistry Department has reinitiated compliance with the frequencies and acceptance criteria specified by NOD-CY.8 for dissolved oxygen and conductivity in-line instrumentation. All in-line performance check surveillances and frequencies have been entered into Braidwood Station's General Surveillance program to ensure that all performance checks are done as required.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

This event has been discussed with the appropriate Chemistry Department personnel to emphasize the importance of procedural adherence.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Braidwood achieved full compliance with the revision of BwCP PD-7 and the deletion of BwCP 510-7 on April 26, 1993.

ADDITIONAL PROGRAM ENHANCEMENTS:

As a further program enhancement, Braidwood will continue to gather data on in-service instruments and develop the statistics necessary to compare long term instrument performance to the requirements of NOD-CY.8. Based on these results, appropriate actions will be initiated by July 30, 1993.

Additionally, BwCP PD-7, "Braidwood Station Quality Control Program," has been revised to allow for recording data and results from in-line quality control performance checks and surveillances in the in-line quality control log books. The acceptance criteria specified in NOD-CY.8 have been included in each of the in-line quality control log books. These actions allowed for the deletion of BwCP 510-7.