



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 12, 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. 50-456/93007; 457/93007
NRC Docket Nos. 50-456 and 50-457

Reference: C.D. Pederson letter to Cordell Reed dated
April 15, 1993, transmitting NRC
Inspection Report Nos. 50-456/93007; 50-457/93007

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 V violation requiring a written response. CEC'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

170073

Attachment

cc: A. Bert Davis, NRC Regional Administrator-RIII
R. Assa, Project Manager-NRR
S. DuPont, Senior Resident Inspector-BW

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Handwritten initials "JED" and a vertical line.

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 50-456/93007; 50-457/93007

VIOLATION (456/457 93007):

Technical Specification 6.11 requires that procedures be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Procedure B_wRP 1110-3, "Radiological Postings, Labels, and Controls," Section C.3, states that each controlled area shall be conspicuously posted so as to warn personnel approaching the area from any direction.

Contrary to the above, on March 24, 1993, the filter valve aisle located on the 383' elevation in the Unit 1 side of the auxiliary building was not conspicuously posted as a contaminated area so as to warn personnel approaching the area from any direction.

REASON FOR THE VIOLATION:

Braidwood acknowledges that the filter valve aisle was not conspicuously posted as a contaminated area as required due to a lack of attention to detail. The entrance to the contaminated area had a posting attached to a yellow and magenta "theater rope" which was hooked to a stanchion. Persons unknown unhooked the rope, passed across the contamination boundary, and failed to reattach the rope to the stanchion.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The yellow and magenta "theater rope" with the posting attached was reattached to the stanchion by Radiation Protection personnel immediately after being notified of the problem by the NRC inspector.

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 50-456/93007; 50-457/93007

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

The use of yellow and magenta "theater ropes" for contamination boundaries has been discontinued. Postings at contamination boundaries are now being arranged so that personnel are not required to detach the rope and posting when passing across the boundary. This posting practice will be done except in those cases where this is impractical or where Radiation Protection personnel are in attendance. This practice will ensure an area is conspicuously posted without requiring personnel to move ropes.

This posting practice was included in the Radiation Protection Daily Orders on April 1, 1993, and communicated to the appropriate Radiation Protection Department personnel during shift turnover meetings.

This event has been communicated to site personnel through various mechanisms.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Braidwood achieved full compliance on March 24, 1993, immediately after the NRC Inspector notified Radiation Protection personnel of the problem.