Commonwealth Edison
Braidwood Nuclear Power Station
Route 71, Box 84
Braceville, Illinois 60407
Telephone 815/458-2801

October 8, 1993
BW/93-0258

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

This report is number 93-005-00, Docket No. 50-456.

K. L. Kofron
Station Manager
Braidwood Station

Encl: Licensee Event Report
No. 50-456/93-005-00

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

130029

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NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

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.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Braidwood 1	05000456	1 OF 3

TITLE (4)
Technical Specification surveillance not performed due to personnel 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 NUMBER
									None	05000
09	10	93	93	-- 005 --	00	10	10	93	FACILITY NAME	DOCKET NUMBER 05000

		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)					
OPERATING MODE (9)	1		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
POWER LEVEL (10)	100		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	TELEPHONE NUMBER (Include Area Code)
J. Gosnell, Systems Engineering	(815)458-2801 x2322

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
				No						

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

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

On September 10, 1993 it was determined that Braidwood Station Technical Specification surveillance 3/4.7.6.e.6, which is an eighteen month verification that the main control room ventilation envelope can be manually isolated, had not been satisfied for the period between November 1989 and August 1993. This was due to the fact that the station procedure that satisfies this Technical Specification surveillance (BwVS 7.6.e-2) had not been placed in the General Surveillance (GSRV) tracking system. BwVS 7.6.e-2 was successfully performed immediately after discovering it had been missed. The cause of the event was a combination of personnel error and procedural deficiency that existed at the time BwVS 7.6.e-2 was written. The author of BwVS 7.6.e-2 did not ensure that the proper tracking mechanism was in place to have the surveillance conducted on an eighteen month frequency. Also, administrative procedure BwAP 1300-2T3, Permanent Procedure Request/Revision/Deletion, did not question the author of a new procedure whether a GSRV entry had to be made. The current revision of this proc re does provide such instructions, and a GSRV entry has been made to prec .e recurrence. This event had no effect on plant or public safety.

NRC FORM 366A (5-92) U.S. NUCLEAR REGULATORY COMMISSION

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Braidwood 1	05000456	93	-- 005 --	00	2 OF 3

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: September 10, 1993;
Event Time: 0000;
Mode: 1 - Power Operation; Rx Power: 100%
RCS [AB] Temperature/Pressure: NOT/NOP

B. DESCRIPTION OF EVENT:

Braidwood Station Technical Specification surveillance 4.7.6.e.6 tests the manual isolation of the control room ventilation system. This specification became effective on July 2, 1987 when Braidwood Unit 1 received its full power license. For the period between July 1987 and November 1989, this surveillance requirement was satisfied during the performance of control room in-leakage surveillances BwOD VC-90 (1/18/88) and special procedure SPP 89-9 (11/16/89).

In May 1990, since the station was pursuing relief from the requirement to perform control room in-leakage testing, surveillance procedure BwVS 7.6.e-2 was written to satisfy the requirements of Technical Specification surveillances 4.7.6.e.2 and 4.7.6.e.6. This surveillance procedure was not placed into the station General Surveillance Program (GSRV), and no other tracking system was used to track the surveillance frequency of 18 months.

On August 21, 1993 a control room in-leakage test was performed which included manually isolating the control room ventilation system. This in-leakage test again satisfied Technical Specification surveillance 4.7.6.e.6.

On September 10, 1993, during a review of testing documentation, Systems Engineering and Operating Department personnel concluded that the requirements of Technical Specification 4.7.6.e.6 were being satisfied by the control room in-leakage testing and that BwVS 7.6.e-2 had never been performed. Procedure BwVS 7.6.e-2 was immediately initiated by Operations and successfully completed on September 10, 1993.

C. CAUSE OF THE EVENT:

The primary cause of the event was personnel error. The author of BwVS 7.6.e-2 failed to enter the requirement into GSRV when the procedure was approved in May, 1990.

A contributing cause was a procedural deficiency. Administrative procedure BwAP 1300-2T3, Permanent Procedure Request/Revision/Deletion, did not question the author of a new or revised procedure whether a GSRV entry had to be made.

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D. SAFETY ANALYSIS

This event had no effect on plant or public safety for the following reasons.

If a chlorine accident, which would require manual isolation of the control room envelope, had occurred, Will County officials would have provided early warning to Braidwood Station. Had the manual isolation function been inoperable, control room personnel would have had sufficient time to don self-contained breathing apparatus.

E. CORRECTIVE ACTIONS

Operating performed BwVS 7.6.e-2 immediately after realizing that the surveillance had not been performed.

BwVS 7.6.e-2 is the approved procedure which meets the testing requirements of 4.7.6.e.6 (manual isolation). It has recently been put into GSRV with a frequency of 18 months.

The 5% and full power license were reviewed and no similar instance of omission of Technical Specification testing requirement 4.7.6.e.6 was found.

LwAP 1300-2T3 was revised in March, 1992 to include a step to check if a GSRV entry needs to be made.

No other Technical Specification surveillance was being satisfied by the control room in-leakage surveillance. Therefore, all corrective actions are in place at this time.

F. PREVIOUS OCCURRENCES

There have been previous reportable occurrences of missed technical specification surveillances. Previous corrective actions addressed root and contributing causes. The previous corrective actions are not applicable to this event.

G. COMPONENT FAILURE DATA

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