



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 17, 1991

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Braidwood Station Units 1 & 2
Response to Inspection Report
456/91010 and 457/91008
NRC Docket Nos. 50-456 and 50-457

Reference: (a) C. E. Norelius Letter to Cordell Reed Dated
April 23, 1991

Reference (a) provided the results of an inspection conducted by Mr. M. A. Kunowski from March 11-22, 1991 at Braidwood Station. The inspection report cover letter cited a concern related to two specific issues. The first involved a number of operational events that led to spills and contamination spread within the plant. The second related to radiological controls exercised over the Unit 1 steam generator work. A written response was requested to identify measures being taken to improve performance with regard to these matters.

The attachment provides a discussion of actions being taken to address the cited issues. Please direct any questions concerning this matter to Dale Ambler, extension 2233, Braidwood Station.

Respectfully,

T. J. Kovach
Nuclear Licensing Manager

cc: A. B. Davis, NRC RIII Administrator
S. G. Dupont, NRC Senior Resident Inspector, Braidwood Station

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ATTACHMENT

DISCUSSION OF SPILLS

Commonwealth Edison (Edison) recognizes the significance of controlling radioactive spills and minimizing the spread of contamination. Edison is strongly committed to the principles of ALARA in order to reduce the amount of unnecessary exposure to the worker. Additionally, we are constantly striving to maintain strong radiological controls over work being performed.

Analysis of the root causes of several of the recent spill events has resulted in corrective actions that are specific to the events. These corrective actions included procedure changes and the inclusion of selected topics into the licensed and non-licensed operator requalification training programs.

A Special Operating Order was issued to the shifts regarding the recent experience with spill events. Specific actions are being taken to increase the awareness of operations management of spill events as they occur. These are (1) including spills as an item on the Shift Engineer and Shift Supervisor turnover, (2) discussing spills at the shift briefing and (3) initiating Deviation Reports for spills.

A Braidwood Station plan has been developed and implemented to address radiological spills. A committee will be formed consisting of representatives from the Operating, Maintenance, Radiation Protection, Training and Regulatory Assurance Departments to (1) review current spills, (2) review ways of effectively communicating information to the appropriate station personnel, (3) provide suggestions for ensuring lessons learned on current spills are applied to future evolutions, and (4) prepare training discussion packages for spills that have occurred. The training packages will be provided to personnel in the Operating, Mechanical Maintenance, Radiation Protection Departments and contractor personnel.

ATTACHMENT

DISCUSSION OF STEAM GENERATOR RADIOLOGICAL CONTROLS PRACTICES

Edison appreciates the NRC's review of radiation protection work practices during the recent Unit 1 refuel outage. In order to address the concerns raised by the inspector, Braidwood Station Radiation Protection representatives will meet with the Station Construction Superintendent and the contractor Project Manager, prior to the upcoming Unit 2 refuel outage, to discuss lessons learned from the Unit 1 steam generator work and to delineate expectations of contracted radiation protection technicians (RPTs) and other steam generator workers during the outage. Specific direction will be given to RPTs to stop work when necessary to ensure adequate radiological controls. A review has shown that most deficient performance during the last outage occurred on the off-shifts. As such, Braidwood Station Radiation Protection personnel will be instructed on the heightened level of attention and personal interface that is required for work being performed on off-shifts.

Edison recognizes the importance of good radiological work practices not only during outages but during all work performance. Edison believes these actions should substantially improve the overall quality of the radiation protection coverage provided by contractors during the upcoming outage.