



Commonwealth Edison
Braidwood Nuclear Power Station
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February 22, 1995

U.S. Nuclear Regulatory Commission
Washington, DC 20555


Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2
Reply to a Notice of Violation
Inspection Report Number
50-457/94028
NRC Docket Numbers 50-456; 50-457

- References:
- 1) J. B. Martin letter to M. J. Wallace dated January 25, 1995, transmitting Notice of Violation from NRC Inspection Report 50-457/94028
 - 2) E. G. Greenman letter to K. Kaup dated January 18, 1995, transmitting NRC Enforcement Conference Report No. 50-457/95004

Enclosed is Commonwealth Edison Company's (ComEd) reply to the Notice of Violation (NOV) which was transmitted with the letter identified in reference 1. The NOV cited four violations which have been classified in the aggregate as a Severity Level III violation requiring a written response. ComEd's response is provided in the attachment.

If your staff has any questions or comments concerning this letter, please refer them to Kevin Bartes, Braidwood Regulatory Assurance Supervisor, at (815)458-2801, extension 2980.


Karl L. Kaup
Site Vice President
Braidwood Station

KLK/JML/mr

Attachment

cc: J. B. Martin, NRC Regional Administrator - RIII
R. R. Assa, Project Manager - NRR
S. G. Du Pont, Senior Resident Inspector
K. A. Strahm, Vice President PWR Operations

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT
50-457/94028

VIOLATION (457/94028-01):

1. Technical Specification (TS) 3.10.5 requires with the Position Indication System inoperable and with more than one bank of rods withdrawn, immediately open the reactor trip breakers.

Contrary to the above, on November 11, 1994, while the Position Indication System was inoperable, rods in two banks were withdrawn on two occasions and the reactor trip breakers were not opened.

2. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, Braidwood Surveillance Procedure BWVS 1.3.3-1, "Digital Rod Surveillance Indication Operability Checkout," Revision 5, was not a type appropriate to ensure compliance with TS 3.10.5, an activity affecting quality. Specifically, the procedure did not clearly state the requirement of TS 3.10.5 to immediately open the reactor trip breakers when the Position Indication System is inoperable and more than one bank of rods is withdrawn.

3. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Braidwood Administrative Procedure BWAP 100-12, "Human Performance Awareness," Revision 3, approved November 23, 1993, Step e.2.b(2), requires, in part, that during "Heightened Level of Awareness" (HLA) meetings preceding special evolutions, the supervisor for the lead work group will, as a minimum, outline what the contingency plan will be if a problem arises.

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VIOLATION (457/94028-01 (continued)):

Contrary to the above, on November 11, 1994, during the HLA meeting conducted prior to the performance of Braidwood Surveillance Procedure BwVS 1.3.3-1, "Digital Rod Surveillance Indication Operability Checkout," the System Engineering Test Director did not outline a contingency plan for the problem of withdrawing more than one bank of rods.

4. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Braidwood Administrative Procedure BwAP 100-12, "Human Performance Awareness," Revision 3, approved November 23, 1993, Step D.2.a, requires that supervisors have the responsibility to monitor the work in progress routinely.

Contrary to the above, on November 11, 1994, the Unit Supervisor did not routinely monitor the performance of Braidwood Surveillance Procedure BwVS 1.3.3-1, "Digital Rod Surveillance Indication Operability Checkout." Specifically, the Unit Supervisor failed to ensure compliance with TS 3.10.5, during the performance of Surveillance Procedure 1.3.3-1.

This is a Severity Level III problem (Supplement I).

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REASON FOR THE VIOLATION:

The aggregate violation was a result of the following:

- The Unit Supervisor did not review the Action Requirement with the extra Nuclear Station Operator (NSO), the Unit NSO, or the System Engineers, and interpreted the Action Requirement incorrectly because of a lack of knowledge of the reason for the action. Additionally the Unit Supervisor showed poor judgement in that he failed to stop the test until the interpretation could be verified by the Shift Engineer, and he failed to recognize the need to observe subsequent rod withdrawals.
- The Extra NSO failed to personally review the Action Requirements or discuss them with another crew member. He also failed to adequately communicate the failures noted during the surveillance to the Unit NSO.
- The System Engineers that directed the test and conducted the HLA failed to ensure that contingencies were clearly understood when the possibility of multiple group movement was noted in the procedure. They also failed to ensure that the specifics of the Technical Specification and associated Action Requirement were discussed and understood.
- The procedure governing the rod withdrawal sequence (D.R.P.I. Operability) noted the appropriate Technical Specification but did not state the Action Requirement to immediately open the reactor trip breakers if more than one bank of rods moved.
- A failure of a Rod Control System firing card also contributed to this event.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The failed firing card in the Rod Control System was replaced and the surveillance was satisfactorily completed prior to declaring the system operable.

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CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

The Operations Manager has counselled the Unit Supervisor on maintaining adequate supervision of routine and non-routine activities.

The Site Vice President and the Operations Manager have discussed conservative decision making and leadership responsibilities with all Shift Engineers.

This event has been discussed with all Operating crews by the Operations Manager and the Shift Operations Supervisor. Emphasis was placed on conservative decision making, HLAs, and adherence to Technical Specifications.

The Operations Manager has talked with the Shift Operations Supervisor and Operating Engineers about the need to follow through to ensure that the correct actions have occurred.

The need to be knowledgeable of applicable Technical Specifications prior to starting activities is being reaffirmed to all licensed operators. Discussions are complete for four of the six Operating crews. Discussions will be held with the remaining two crews by April 30, 1995.

This event is being reviewed with licensed personnel with emphasis on the need for Technical Specification adherence, use of Technical Specification Section 3.10 (Special Test Exception Section), Technical Specification 3.10 associated procedures, and the reason for taking the action required by the Technical Specification. Reviews are complete for four of the six Operating crews. Reviews will be performed for the remaining two crews by April 30, 1995.

The Human Performance Awareness Procedure has been enhanced to require written documentation for each HLA briefing. Additionally, the procedure was enhanced to include Technical Specifications requirements, and the HLA form was revised to highlight the required topics.

System Engineers have been trained on the requirements of the revised HLA procedure and the proper conduct of a HLA briefing, with this event being used as an example.

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CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION
(continued):

All other procedures addressing Technical Specification Special Test Exception section 3.10 will be reviewed for similar problems and enhanced if required. While there are other Technical Specifications with immediate action requirements, section 3.10 is unique in that it is infrequently invoked and it provides exceptions to the normal Technical Specifications. This review will be complete by March 31, 1995. Revisions to the applicable procedures will be initiated as appropriate.

The procedure for D.R.P.I Operability has been enhanced to better describe the action requirements of Technical Specification 3.10.5 (Special Test Exception Section).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved.