

Commonwealth Edison Company
Braidwood Generating Station
Route #1, Box 84
Braceville, IL 60407-9619
Tel 815-458-2801

ComEd

June 2, 1995

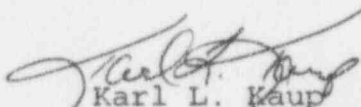
Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Braidwood Nuclear Power Station Units 1 and 2
Reply to a Notice of Violation
Inspection Report Number
50-456/457/95006
NRC Docket Numbers 50-456; 50-457

References: 1) L. F. Miller letter to K. Kaup dated
May 8, 1995, transmitting
Notice of Violation from
NRC Inspection Report 50-456/457/95006

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 two Severity Level IV violations 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

9506120528 950602
PDR ADOCK 05000456
G PDR

A Unicom Company

JED

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT
50-456/457/95006

VIOLATION (50-456/457/95006-01):

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

Contrary to the above, on March 24, 1995, during reassembly of the 2A residual heat removal cubicle cooler, the work package did not contain adequate instructions concerning cooler tube sheet gasket orientation. As a result, the gasket was installed incorrectly rendering the cooler inoperable.

This is a Severity Level IV violation (Supplement I).

REASON FOR THE VIOLATION:

The cubicle cooler vendor manual does not provide any directions or drawings for correct gasket orientation other than to note the hole pattern on the originally installed gasket. Consequently, no orientation directions or drawings were provided in the Work Package. The old gasket was so deteriorated that workers installed the new gasket based on their judgement, which was incorrect.

There was no surveillance test to determine component operability prior to returning the cubicle cooler to service. Having only performed a cleaning and inspection, System Engineering incorrectly determined that no surveillance was required to return the cooler to service.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

After maintenance was complete and the cooler was returned to service, System Engineering performed a thermal performance test of the cooler to obtain baseline data. When the test failed, the cooler was declared inoperable and the applicable Technical Specification Action Requirement was entered.

The cooler was disassembled to investigate potential problems when the gasket that separates the channel head and flow baffle was found reversed. A new gasket was correctly installed and the cooler reassembled. The thermal performance test was performed with satisfactory results and the applicable Technical Specification Action Requirement was exited.

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT
50-456/457/95006

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

Mechanical Maintenance management has discussed with department personnel the importance of maintaining a questioning attitude, especially in instances like this event, where an opportunity for error exists with little or no guidance available.

A supervisory hold point is being established for work packages to verify correct placement of gaskets during cubicle cooler cleaning and rebuild. This will be completed prior to the next cubicle cooler cleaning or rebuild.

When available, drawings will be included in the cubicle cooler work packages to visually indicate correct gasket placement and orientation. New detailed drawings of the cubicle coolers are being ordered from the vendor.

A note is being added to cubicle cooler work packages stating that when no drawing is available and there is any doubt of gasket placement, the System Engineer should be contacted for assistance.

System Engineering is evaluating and determining an acceptable method of testing room cubicle coolers following cleaning and inspection activities prior to their being returned to service and declared Operable. This will be completed prior to the next cubicle cooler cleaning or rebuild.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved for the cited violation.

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT
50-456/457/95006

VIOLATION (50-456/457/95006-02):

10 CFR 50, Appendix B, Criterion XVI, requires that measures shall be established to assure that conditions adverse to quality are promptly identify and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, on February 15, 1995, the inspector discovered all four diesel generator exhaust silencer room doors blocked open although corrective actions to ensure the seal tight closure of these doors had been identified following the 1A diesel generator rupture disc failure on May 15, 1994.

This is a Severity Level IV violation (Supplement I).

REASON FOR THE VIOLATION:

Corrective actions in response to the May 15, 1994, event included a review of the sealing details for the diesel generator exhaust silencer room doors to reduce the potential leak path for the diesel generator exhaust and silencer insulation debris. This review resulted in the initiation of a design change to the door seals. However, these corrective actions did not take into account a possibility that the doors may be blocked open for non-routine maintenance.

Maintenance personnel incorrectly considered the job complete upon finishing their assigned task. They failed to bring the job to closure by not cleaning the area, removing their work materials, and closing the doors.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Upon notification by the NRC Resident Inspector, the doors to the diesel generator exhaust silencer rooms were immediately closed. Scaffolding, insulating materials, and lighting were removed.

A posting was placed on all four doors to alert personnel that the doors need to remain closed.

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT
50-456/457/95006

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

This event was discussed with the appropriate Maintenance personnel to convey management expectations regarding cleaning and restoring work areas to acceptable standards after completion of work activities.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The corrective actions from the May 15, 1994, event combined with the corrective actions associated with this event, have brought Braidwood into compliance.