



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 2, 1992

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

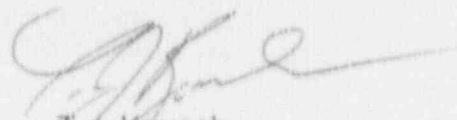
Subject: Braidwood Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-456/91026; 50-457/91026
NRC Docket Numbers 50-456 and 50-457

Reference: B. Clayton letter to C. Reed dated February 3, 1992
transmitting NRC Inspection Report
50-456/91026; 50-457/91026

Enclosed is Commonwealth Edison Company's (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and inspection report. The NOV cited one Severity Level IV violation requiring a written response. The violation concerned the failure to comply with an administrative procedure, which requires that shift operators be aware of changes in plant status. CECo's response is provided in the following attachment.

If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 515-7285.

Very truly yours,


T.J. Kovach
Nuclear Licensing Manager

Attachment

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

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 456/91026: 457/91026

VIOLATION:

During an NRC inspection conducted on December 14, 1991 through January 17, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the following violation is listed below:

Braidwood Unit 1 and 2 Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the following activities:

- The applicable procedures recommended in appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes administrative procedures.

Contrary to the above on January 10, 1992, the licensee failed to comply with Administrative Procedure BWAP 300-1, Step C.5, which requires that shift operators be made aware of changes in plant status. Personnel inadvertently removed 2A containment spray pump, rather than the 2A residual heat removal pump, from service for preventive maintenance, and failed to inform the shift operators of the error.

This is a Severity Level IV violation (Supplement I)

REASON FOR THE VIOLATION:

On January 13, 1992, at 7:00 A.M., fuel handling personnel were assigned the task of changing the oil in the 2A Residual Heat Removal (RH) Pump. At 8:30 A.M., the fuel handlers changed the oil in what they thought was the 2A RH pump; however, they were working on the 2A Containment Spray (CS) pump. The lubrication activity was completed at 9:10 A.M. Later that morning, the fuel handlers returned to the RH/CS pump room and determined that they had changed the oil in the wrong pump. The fuel handlers then changed the oil in the 2A RH pump and were done at 10:05 A.M. The fuel handlers returned to the office and paged their supervisor to communicate the situation. The fuel handling supervisor returned to the office at approximately 11:45 A.M. with a priority job for the fuel handlers. At that time, the fuel handlers were unsuccessful in communicating to their supervisor that the oil in the CS pump had been changed. At 12:15 P.M., an operator contacted the fuel handling supervisor to inquire if work activities had been performed earlier on the 2A CS pump. The supervisor pursued this question with his fuel handlers and was informed by them that they had worked on the wrong pump. The fuel handling supervisor immediately contacted the Operating Engineer who directed the supervisor to contact the Shift Engineer. The fuel handling supervisor immediately notified the Shift Engineer.

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 456/91026; 457/91026 (continued)

The fuel handlers were not aware of the requirement to contact the Shift Engineer of the change in the status of a plant component as per BwAP 300-1, "Conduct of Operations." They intended to notify their immediate supervisor in lieu of the Shift Engineer.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:

On January 14, 1992, the Fuel Handling Department staged a departmental stand down to discuss this event with Senior Station Management. Management expectations regarding compliance with BwAP 300-1 and the need for attention to detail was stressed. As a result of this stand down, fuel handling supervisors along with the fuel handlers developed a Lubrication Task Checklist. This checklist is used as an aid to ensure the lubrication job is performed as intended. Additionally, a caution statement is included to notify the Shift Engineer if work has begun on the wrong component. This checklist was initiated on January 20, 1992.

A General Information Notice (GIN) was issued to the Station employees. This GIN described the subject event and stressed the importance of informing the Shift Engineer of the change in status of plant components.

CORRECTIVE ACTIONS TAKEN TO PREVENT FURTHER VIOLATION:

The station will develop a new procedure, BwAP 100-10, "Conduct of Station Personnel," which will be modeled after BwAP 300-1, "Conduct of Operations." This procedure will specifically address the reporting of adverse conditions which affect plant safety to the Shift Engineer. This procedure is expected to be issued by July 1, 1992. Training on this procedure will be developed for initial and continuing training. Lesson plans are expected to be completed by August 1, 1992.

Finally, BwAP 370-1, "Station Lubrication Program," will be revised to incorporate the Lubrication Task Checklist. This revision is expected to be issued by May 1, 1992.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance was achieved on January 14, 1992, when management's expectations regarding compliance with BwAP 300-1 was reviewed with fuel handling personnel.