

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



September 15, 1995
BW/95-0090

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

Gentlemen:

The enclosed Licensee Event Report from Braidwood Generating Station is being transmitted in accordance with the requirement of 10 C.F.R. 50.73(a)(2)(i)(b), which requires a 30-day written report.

This report is number 95-008-00, Docket No. 50-456.

Yours truly,

A handwritten signature in dark ink, appearing to read "T.J. Tulon", is written over the typed name.

T.J. Tulon
Station Manager
Braidwood Nuclear Station

TJT/BJM/dla
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Encl: Licensee Event Report
No. 456-95-008-00

cc: NRC Region III Administrator
NRC Resident Inspector
INPO Record Center
ComEd Distribution Center
I.D.N.S.
I.D.N.S. Resident Inspector

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A handwritten signature in dark ink, possibly reading "JE22", is written in the bottom right corner of the page.

LICENSEE EVENT REPORT (LER)

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

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 (HNB 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.

FACILITY NAME (1)
Braidwood 1DOCKET NUMBER (2)
05000456PAGE (3)
1 OF 4

TITLE (4)

ECCS Equipment Room differential pressure not maintained due to Management Deficiency and Personnel Error.

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
08	18	95	95	-- 008 --	00	09	18	95	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		100	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
			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
S. Barnes, System EngineeringTELEPHONE NUMBER (Include Area Code)
(815) 458-2801 x2892

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
				N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES
(If yes, complete EXPECTED SUBMISSION DATE).

x NO

EXPECTED
SUBMISSION
DATE (15)

MONTH DAY YEAR

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

On August 18, 1995, two incidences occurred of an Emergency Core Cooling System (ECCS) Equipment Room not being able to maintain its required differential pressure (DP), with respect to outside, of -0.25" water gauge (w.g.). In the first case, floor plugs had been removed from the 1B Residual Heat (RH) removal pump room without being reviewed for impact on the room's DP. Later that day, after actions had been carried out to ensure the required DP could be met, a door was propped open to the Auxiliary Building which caused the 1B RH pump room to again not maintain -0.25" w.g. The door was closed and the required DP restored. The cause for the first case was not realizing the procedure that controls such barrier impairments applied to the removal of floor plugs, coupled with the failure of Work Control to realize the applicability of a similar issue that had occurred on the 1A RH pump room on 7/26/95. The second case was caused by personnel not following the barrier impairment procedure for a door that is specifically called out as a Heating, Ventilation, and Air Conditioning (HVAC) boundary. The corrective actions to prevent reoccurrence is to revise the Barrier Impairment Procedure to be more descriptive and add a list of ECCS Equipment Rooms as having HVAC boundaries, labeling all HVAC boundary doors and floor plugs, and training on the Barrier Impairment Procedure as to what constitutes an HVAC boundary.

NRC FORM 366A
(5-92)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95**LICENSEE EVENT REPORT (LER)**
TEXT CONTINUATIONESTIMATED 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
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WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK
REDUCTION PROJECT (3150-0104), OFFICE OF
MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Braidwood 1	05000456	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		95	-- 008 --	00	

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: August 18, 1995;
 Event Time: 1130;
 Mode: 1 - Power Operation; Rx Power: 100%;
 RCS [AB] Temperature/Pressure: NOT/NOP

B. DESCRIPTION OF EVENT:

There were no other systems or components inoperable at the beginning of the event that contributed to the severity of the event.

On 8/18/95 at 1130 a System Engineer (non-licensed) discovered the floor plugs above the 1B Residual Heat (RH) pump room had been removed in preparation for planned maintenance without notification given to the System Engineering Auxiliary Group. With the floor plugs removed, the pump room was open to the Curved Wall Area on 364'. The Auxiliary Group reviews Plant Barrier Impairments (PBI) for possible Heating, Ventilation, and Air Conditioning (HVAC) boundary effects but, the floor plugs had not been included in the PBI program. The Unit 1 Supervisor (senior licensed operator) ordered the double door to the Auxiliary Building at 401' closed so that there would be no question that the required -0.25" water gauge (w.g.) differential pressure (DP), with respect to outside, could be maintained in the pump room.

The pump room's DP with respect to outside was estimated at -0.17" w.g.. System Engineering obtained the estimate by measuring the pump room's DP with respect to the general area of the Auxiliary Building (after the double door at 401' had been shut) and adding that to the DP between the Auxiliary Building and outside that was obtained before the door at 401' was shut.

Subsequently, at 1400 hours the same day, a System Engineer noticed the Auxiliary Building to outside DP was at -0.06" w.g. as indicated by OPDI-VA035 on panel OPM02J. The System Engineer investigated and found security door 208 at 401' on the Unit 1 side propped open so a hose could be run through it. There was a security guard posted but no PBI had been processed. The System Engineer called the Control Room, relayed the information and had the Unit 1 Supervisor contact the supervisor of the job to remove the hose.

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Braidwood 1	05000456	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 4
		95	- 008 -	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B) - Any operation or condition prohibited by the plant's Technical Specification.

C. CAUSE OF THE EVENT:

The first incident was caused by a combination of Personnel Error and Management Deficiency. Mechanical Maintenance failed to apply the definition of a Plant Barrier as described in BwAP 1110-3 (Plant Barrier Impairment Program). The definition states, in part, "Barriers are defined as concrete walls, floors, and ceilings". The floor plug that was removed was part of the ceiling of the pump room. Contributing factors to this cause is the floor plug was not labeled as an HVAC boundary. Also, Work Control did not question the floor plug removal after a similar incident involving propped doors to a Chemical Volume (CV) pump room and floor plugs removed from the 1A RH pump room had called DPs into question. Problem Identification Forms (PIF) had been written for both occurrences on 7/24/95 and 7/26/95. System Engineering was called to participate in Work Control's planning of how to satisfy the pump room DP requirements while having the door propped open to the CV pump room and floor plug removed from the 1A RH pump room.

The second incident was caused by Personnel Error. Personnel disregarded the PBI procedure altogether. The door in this case is listed in Attachment 5 of BwAP 1110-3 as being an HVAC boundary, which requires a review of the impact on the applicable HVAC systems.

D. SAFETY ANALYSIS:

Since a DP did exist between the outside and the 1B RH pump room, the intent for the Technical Specification requirement of -0.25" w.g., was indirectly met by the airflow remaining in the direction of clean areas to potentially contaminated areas. In addition, any air contaminants that could have travelled to the curved wall area via the removed floor plugs, would also have been treated through the Auxiliary Building HVAC non-accessible system (High Efficiency Particulate Adsorber, Charcoal Adsorber, High Efficiency Particulate Adsorber).

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Braidwood 1	05000456	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 of 4
		95	-- 008 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

E. CORRECTIVE ACTIONS:

Immediately upon discovery of the DP problem, the double door that had been kept open at the Auxiliary Building entrance at 401' was closed. By closing the door at 401', the Auxiliary Building, and subsequently the ECCS Equipment Rooms, are able to remain between -0.3" and -1.0" w.g.DP.

BWAP 1110-3 has been revised to give clearer descriptions of what is a plant barrier. An attachment was also added to the procedure listing all of the ECCS Equipment Rooms and noting that any impairment to their walls, floors, or ceilings need an HVAC review by System Engineering. All of the HVAC boundary doors listed in Attachment 5 of the procedure will be labelled as such, as well as the floor plugs to ECCS Equipment Rooms. This will be tracked to completion by commitment 456-180-95-00801.

In addition, the new revision to the PBI procedure will be communicated to Station personnel with a review of what constitutes an HVAC boundary. This will be tracked to completion by commitment 456-180-95-00802.

F. PREVIOUS OCCURRENCES:

A review was performed of Braidwood Databases and no LER's involving ECCS Equipment Rooms not maintaining their DP's were found.

G. COMPONENT FAILURE DATA:

This event was neither the result of a component failure nor did any components fail as a result of this event.