

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



February 21, 1996

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 from
Inspection Report Number 50-456/457/95017
NRC Docket Numbers 50-456; 50-457

References: 1) L. F. Miller letter to K. Kaup dated February 2, 1996, transmitting
Notice of Violation from NRC Inspection Report 50-456/457/95017

Enclosed is Commonwealth Edison Company's (ComEd) response to the Notice of Violation (NOV) which was transmitted with the letter identified in reference 1. The NOV cited a Severity Level IV violation requiring a written response. ComEd's response is provided in the attachment.

The following commitment to the NRC is included in the attachment:

- Modifications that have been installed in the past two years are being reviewed to determine if there were any other instances where Operator Rounds were not appropriately revised related to the modification that was performed. This review will be completed by March 31, 1996.

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

Karl L. Kaup
Site Vice President
Braidwood Station

KLK/JML/tts
Attachments

040115

cc: H. J. Miller, NRC Regional Administrator - RIII
R. R. Assa, Project Manager - NRR
C. J. Phillips, Senior Resident Inspector

9603050370 960221
PDR ADOCK 05000456
Q PDR

JE01

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/95017

VIOLATION (50-456/95017-02):

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

Contrary to the above, on December 3, 1995, it was determined that non-licensed equipment operator logs had a float voltage acceptance value for the Unit 1, 111 and 112, 125 vdc batteries that was below technical specification requirements.

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

REASON FOR THE VIOLATION:

The violation was the result of inadequate procedures that failed to address Operator Rounds as part of the change process. The Unit 1, 111 and 112, 125 vdc batteries were replaced during refueling outage A1R04. The AT&T replacement batteries have a Technical Specification voltage limit of 130.5 volts as compared with the previous Gould batteries which had a voltage limit of 126.0 volts. When the modification was performed, surveillance values were changed but the Operator Rounds were never addressed. A review of BwAP 2321-12, "Plant Modification Designed by Engineering," BwAP 2321-13, "Plant Modification Designed by Technical Staff," BwAP 2321-21, "Exempt Changes," and BwAP 1240-1, "Preparation, Distribution and Revision of Technical Specification Interpretations," revealed that Operator Rounds are never identified for review as part of the change process.

Additionally, the Equipment Operator performing the Rounds had an insufficient degree of attention in that he failed to recognize that a surveillance acceptance value was below the Technical Specification value.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

During review of the Operator Rounds, the Unit 1 Unit Supervisor identified that the battery terminal voltage reading was below the Technical Specification requirement of 130.5 volts. LCOAR 8.2.1-1a was entered and the Equipment Operator and a Field Supervisor were dispatched to investigate. They adjusted the float voltage and verified that the terminal voltage was within the acceptable limits.

The operator performing the surveillance was counseled concerning his responsibility in recognizing parameters that are above or below acceptance criteria when performing surveillances or operator rounds.

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/95017

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

The Operator Rounds were revised to incorporate the correct voltage acceptance value consistent with the Technical Specification requirements.

Procedures BwAP 2321-12, BwAP 2321-13, BwAP 2321-21 and BwAP 1240-1 have been revised to include the requirement to review Operator Rounds for necessary changes as part of the process.

Modifications that have been installed in the past two years are being reviewed to determine if there were any other instances where Operator Rounds were not appropriately revised related to the modification that was performed. This review will be completed by March 31, 1996.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on December 3, 1995, when the battery float voltage was properly adjusted and the LCOAR was exited.