

Commonwealth Edison Company
Braidwood Generating Station
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April 10, 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 50-456/457/96002
NRC Docket Numbers 50-456; 50-457

References: 1) L. F. Miller letter to K. Kaup dated March 13, 1996, transmitting
Notice of Violation from NRC Inspection Report 50-456/457/96002

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 two Severity Level IV violations requiring a written response. ComEd's response is provided in the attachment.

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

- Additional training on the containment air sample panel, including the revised procedure BwCP 703-21, will be conducted for Chemistry Technicians during training cycle 96-02, and will be completed by July 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 Generating Station

KLK/JML/tts

Attachments

9604220189 960410
PDR ADOCK 05000456
Q PDR

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

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/457/96002

VIOLATION (50-456/457/96002-01):

10 CFR 50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, defective material and equipment, and nonconformances are promptly identified 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, the licensee failed to take prompt corrective actions to prevent materials from blowing off the service building roof, although previous occurrences of materials blowing off the service building and turbine building roof in the vicinity of the unit auxiliary transformers had been identified on November 30 and December 6, 1995, and January 17, 1996.

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

REASON FOR THE VIOLATION:

Actions to address previous occurrences of materials blowing off the building roofs consisted of notifying supervisors and workers to remove loose debris from the roofs and tying other materials down. This action was ineffective, especially in the event of high, gusting winds.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Replacement of the turbine and service building roofs was completed and all loose materials were removed from the roofs.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

The Station will control and limit materials staged on the roof to those of sufficient weight that they cannot be blown off the roof. Materials that could potentially be blown off the roof will be staged on the roof the same day they will be used. Otherwise, materials will be stored in an area that will prevent them from being blown off the roof.

Workers were instructed not to leave loose materials unattended on the roof.

Requirements for staging of roofing materials were incorporated into the bid specification for the roofing work that will be performed on the auxiliary and fuel handling building roofs.

To heighten general personnel awareness of the significance of this issue, this subject and potential consequences were reviewed in the Braidwood daily newsletter and communicated to site personnel.

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/457/96002

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved for this violation. The corrective actions combined with the infrequent need to perform work on the building roofs should prevent recurrence.

VIOLATION (50-456/457/96002-02):

10 CFR 50, Appendix B, Criterion XI, requires a test program to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The program shall include proof tests, pre-operational tests, and operational tests during plant operations.

Contrary to the above, the licensee failed to incorporate verification of proper operation of sample line heat trace control equipment specified in design documents into the containment air sample testing procedures.

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

REASON FOR THE VIOLATION:

Braidwood Chemistry procedure BwCP 703-21, "Post Accident Sampling of Containment Atmosphere in the Manual Mode of Operation," was inadequate in that it lacked direction to verify proper sample line temperature and provided no acceptance criteria for the sample line temperature. The procedure was considered sufficient without this information.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Braidwood Chemistry Department personnel contacted the manufacturer of the containment air sample panel and received clarification of sample line temperature criteria. A review by Chemistry personnel determined that these criteria have been met during normal operations.

A department meeting was held with Chemistry personnel to discuss these issues and the requirements for ensuring proper sample line temperature.

ATTACHMENT

**REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT 50-456/457/96002**

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

BwCP 703-21 has been revised to include verification of the sample line temperature criteria based on vendor criteria.

Additional training on the containment air sample panel, including the revised procedure BwCP 703-21, will be conducted for Chemistry Technicians during the current training cycle 96-02, and will be completed by July 31, 1996. The next scheduled performance of BwCP 703-21 is in June 1996. Chemistry Technicians that will be performing the surveillance will have already received the described training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance has been achieved with revision of BwCP 703-21.