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May 15, 1996

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

Subject: Reply to a Notice of Violation from Integrated Inspection Report Number
50-456/457/96007
Braidwood Nuclear Power Station Units 1 and 2
NRC Docket Numbers 50-456, 50-457

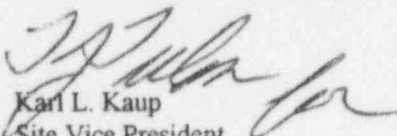
References 1) Lewis F. Miller, Jr. letter to K. Kaup dated April 17, 1996,
transmitting Notice of Violation from NRC Integrated Inspection Report
50-456/457/96007

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 one Severity Level IV Violation requiring a written response.

The following commitments to the NRC are included in the attachment:

- Operations and Fire Watch personnel will be counseled on the Station's expectations regarding the importance of doors being in their proper position by June 30, 1996,
- The diesel generator exhaust silencer doors will be included as part of an Operation's surveillance by June 30, 1996,
- Minor maintenance personnel will be counseled on the emergency light concern, including the importance of questioning attitudes and post maintenance verifications by June 30, 1996,
- Braidwood will continue with the Station's Improvement Initiative Plans.

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

Attachment

cc: H.J. Miller, NRC Regional Administrator -RIII
R. R. Assa, Project Manager - NRR
C. J. Phillips, Senior Resident Inspector
F. Niziolek, Division of Engineering, Office of Nuclear Safety - IDNS

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ATTACHMENT

REPLY TO NOTICE OF VIOLATION

VIOLATION (50-456/457/96007-01):

10CFR50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, 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 actions taken to preclude repetition.

Contrary to the above,

On March 11, 1996, the inspectors identified a defective and ajar 2A diesel generator exhaust muffler room door although corrective actions to assure that the door would remain closed had been taken for an event which occurred on February 15, 1995.

Appendix R emergency light 1-121 was not functioning properly from January 4, 1996, to February 20, 1996, although actions had been initiated on January 4, January 11, January 29, and February 13, 1996, to return the light to normal status.

On January 30, 1996, no corrective actions were taken in response to increased leakage into the Unit 2 pressurizer relief tank.

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

REASON FOR THE VIOLATION:

At the time the 2A diesel generator exhaust silencer door was found slightly open, the door latch was found broken and not able to hold the door closed.

The Appendix R emergency light 1-121 was identified as having a low electrolyte level. Two action requests (AR #960000790 and #960006868) were written to address this concern; however it was identified that both action requests gave an incorrect location of the 1A CV pump room versus the 1B CV pump room. AR #960010637 was then written with the proper location. Several days later, it was discovered that the work performed under the newer action request did not adequately address the necessary repairs.

During a review of control room logs and computer data, it was determined that a high pressure alarm for the pressurizer relief tank (PRT) was received for several days in January. Reactor operators stated that it was not uncommon for the alarm to come in and that it was usually due to a level increase with the input likely to be from leakage of primary water through the PRT containment isolation valve

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REPLY TO NOTICE OF VIOLATION

REASON FOR THE VIOLATION (continued):

(2AOV-RY8030). Discussions with personnel revealed that no corrective actions had taken place in response to these alarms because the leakage sources could not be identified due to the small size of the sources.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

After the February 1995 event, when the four diesel generator exhaust silencer doors were blocked open, the primary corrective actions taken involved closing the doors and posting signs in the area to indicate their required closed position. Following the more recent event from March 15, 1996, the door closure mechanism was replaced and the latch was adjusted to allow the door to be properly secured.

The work on the emergency light was ultimately completed satisfactorily and the light is now operable.

Containment entries were made and Action Requests (ARs) were generated to work on the identified leakage sources during the recent outage. The 2CV2117 leakoff was identified as the greatest contributor to the leakage.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

A revision will be made to the "Diesel Generator Operability Monthly (staggered) and Semi-annual (staggered) Surveillance" Procedures (1BwOS 8.1.1.2.a-1, 1BwOS 8.1.1.2.a-2, 2BwOS 8.1.1.2.a-1, and 2BwOS 8.1.1.2.a-2) to include a step to inspect the diesel generator exhaust silencer doors to ensure the doors are in their proper position. In addition, the Station's expectations on verifying that the doors are in their proper position will be communicated to individuals who use the door routinely, including Operations and Fire Watch personnel. These actions will be completed by June 30, 1996.

Minor maintenance personnel will be counseled on the importance of both questioning attitudes and post maintenance verifications as a result of the problems encountered with the emergency light. Focusing on the questioning attitudes will address the situation where the two action requests specifying the incorrect location were closed out by workers who didn't question the work location further. Targeting the importance of post maintenance verifications will address the situation where the repairs done on the light did not sufficiently resolve the identified problem. These actions will be completed by June 30, 1996.

Attention to detail and procedure adherence are topics that will continue to be emphasized in Licensed Operator Requalification Training.

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CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS (continued):

The examples specified in this violation reflect on the corrective action difficulties that the Station has been experiencing. Efforts are being made to remedy these problems through the near-term Improvement Initiative Plans. These plans are expected to be developed by June 24, 1996, with the expectation to see performance improvements by the end of 1996. In addition to the Improvement Plans, an external review of the Station's Corrective Action Program is also being done at this time by Failure Prevention International (FPI). Closure of this review and recommendations for improvement are expected within the next few weeks.

While waiting for the Improvement Initiative Plans and the results from the independent review, the Station has already made enhancements to the Corrective Actions Program. For example, individuals have been added to the Root Cause Team to allow more root cause investigations to take place without compromising the quality of the investigations. The Station has also required more Senior Management involvement in dealing with identified problems.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved for this violation when the 2A diesel generator exhaust muffler room door was repaired, the work on the emergency light was properly completed, and the work was finished to adequately address the leakage sources in the U2 pressurizer relief tank. The Station also has planned additional corrective actions to prevent recurrence of the violations associated with the diesel generator exhaust muffler room doors and the emergency light.