

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station
Braceville, Illinois

Docket Nos. 50-456; 50-457
License Nos. NPF-72; NPF-77

As a result of an inspection conducted from July 27 through September 6, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances, and be accomplished in accordance with these instructions, procedures, or drawings.
 - A. Braidwood Operations Procedure 2BwOS 8.1.1.2.a-2, "2B DG Operability Monthly (Staggered) And Semi-annual (Staggered) Surveillance," steps F.9.7 through F.9.9, required, in part, independent verification of the position of the 2B emergency diesel generator (DG) day tank instrument leg drain valve, 2D02116B, the 2B DG starting air receiver drain valves, 2SA147B/D, and the 2B DG starting air separator drain valves, 2SA141B/D.

Contrary to the above, on August 21, 1996, the diesel operators did not independently verify the position of valves 2D02116B, 2SA147B/D, and 2SA141B/D as required by Surveillance Procedure 2BwOS 8.1.1.2.a-2, "2B DG Operability Monthly (Staggered) and Semi-annual (Staggered) Surveillance," steps F.9.7 through F.9.9 (50-457/96012-02a).

- B. Braidwood Administrative Procedure, BwAP 1340-1, "Drawings Issued Procedure," Revision 10, states, in part, that drawing sets (piping and instrumentation diagrams (P&IDs) or electrical schematics) which are issued and maintained current through Central File are marked as "AUTHORIZED FOR USE."

Braidwood Administrative Procedure, BwAP 330-1, "Conduct of Operations," Revision 18, requires, in part, that only controlled, approved documents, such as P&IDs and selected schematics, are to be used by shift operating personnel to conduct operations, and that these documents are maintained current by being stamped "REVISION PENDING" where outstanding revisions of the drawing exist.

Contrary to the above, as of August 8, 1996, P&IDs and electrical schematics that were marked "AUTHORIZED FOR USE" and used by shift operating personnel in the control room had outstanding revisions and were not stamped "REVISION PENDING" as required (50-457/96012-02b).

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

2. 10 CFR 50, Appendix B, Criterion II, "Quality Assurance," requires, in part, that activities affecting quality shall be accomplished under suitably controlled conditions.

Surveillance testing required by technical specifications 4.8.1.1.2 to verify operability of the diesel generator is an activity affecting quality.

Contrary to the above, on numerous occasions, including July 31, 1996, technical specification Surveillance 1BWOS 8.1.1.2-a.1, "1A Diesel Generator Operability Monthly (Staggered) And Semi-Annual (Staggered) Surveillance," was not conducted under suitable conditions in that diesel generator service water valve 1SX169A, was manually exercised per the surveillance procedure prior to the start of the diesel generator. 1SX169A is required to open automatically upon the diesel generator start to ensure operability of the diesel engine (50-456/96012-04).

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

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region III, 801 Warrenville Road, Lisle, Illinois, 60532, and a copy to the NRC Resident Inspector at the Braidwood Station within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois
this 23 day of October 1996