

Commonwealth Edison Company  
Braidwood Generating Station  
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January 21, 1997

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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

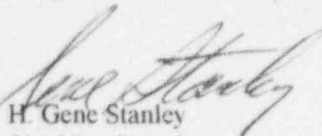
Subject: Reply to a Notice of Violation from Inspection Report 50-456(457)/96014  
Braidwood Nuclear Power Station Units 1 and 2  
NRC Docket Numbers 50-456 and 50-457

References: 1) J. L. Caldwell letter to H. G. Stanley dated January 3, 1997, transmitting  
Notice of Violation from NRC Inspection Report 50-456(457)/96014

Reference 1 contains the Severity Level IV Notice of Violation (NOV) identified during a six week inspection period that took place from September 6 - October 18, 1996. ComEd's response to this NOV is included in Attachment 1.

Braidwood Station is aware and actively pursuing the resolution of identified problems associated with procedures. In the situation described in the cited NOV, a Unit Supervisor was preparing for upcoming surveillances ahead of time by reviewing them and marking up applicable sections. This action is encouraged so our workers can execute their tasks in a controlled and deliberate manner. In this case, the surveillances were updated and put in the control room books and files shortly after the execution copy of the procedure was obtained for use in the field. As a result, the wrong revision was used. The process of informing the Shift has been modified and the mechanism has been discussed with the appropriate Operations personnel.

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.

  
H. Gene Stanley  
Site Vice President  
Braidwood Station

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Attachment

cc: A. B. Beach, 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 1

### REPLY TO NOTICE OF VIOLATION

#### VIOLATION (50-456/457/96014-01)

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

Contrary to the above on September 10, 1996, operations personnel in the control room were performing 1BwOS 8.1.1.2.a-2, "Unit One 1B Diesel Generator Operability Monthly (Staggered) and Semi-annual (Staggered) Surveillance," Revision 15 dated September 9, 1996. The inspectors observed that the non-licensed operator in the diesel generator room was using 1BwOS 8.1.1.2.a-2, Revision 14E1 dated June 28, 1996, which was inappropriate for the circumstances.

This is a Severity Level IV violation (Supplement I) (50-456/96014-01).

#### REASON FOR THE VIOLATION:

The wrong revision of 1BwOS 8.1.1.2.a-2, "Unit One 1B Diesel Generator Operability Monthly (Staggered) and Semi-annual (Staggered) Surveillance" was used because clerical personnel updated the surveillances in both procedure books and files in the control room as well as in Central Files after the Unit Supervisor had pulled the surveillances to review them and mark up applicable sections.

#### CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED:

During the surveillance, the NSO running the diesel generator contacted the Unit Supervisor at step f.5 of 1BwOP DG-11 (the surveillance procedure used in conjunction with 1BwOS 8.1.1.2.a-2 to perform the 1B diesel generator monthly surveillance). It was determined at that point that a discrepancy existed between the two procedures and efforts were made to contact the appropriate System Engineering personnel to resolve the conflict. As this was going on, the visiting NRC inspector questioned the operator in the diesel room about the procedure revision and it was determined that the wrong revision was being used in the field.

Upon the discovery of the wrong revision, the Unit Supervisor retrieved a copy of the newer revision (Rev. 15) and dispatched a copy to the 1B Diesel Generator room. In addition, the Shift Engineer was contacted. After a comparison between the two revisions was done, the duty Shift Engineer and oncoming Shift Engineer agreed to continue with the surveillance and transfer all applicable steps to the newer revision. The surveillance was ultimately completed satisfactorily.

#### CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATION:

A mechanism is in place to prevent this situation from recurring. Each day, the Office Support Clerk provides a list of all procedure transmittals to the appropriate Unit Supervisor (in the past, the transmittals were given to the Shift Engineer). These transmittals inform the Shift of procedure / surveillance updates. Discussions have been held with the appropriate Operations

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personnel to enhance their awareness of the transmittal update process. In addition, guidance on providing this information has been included in the Shift Clerk's job notes maintained for that position.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance for this violation was achieved when the outdated revision was removed from use.