

## 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 November 30, 1996 through January 10, 1997, several 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) Technical Specification 6.8.1.a requires that procedures be established, implemented, and maintained for activities covered in Appendix A of Regulatory Guide 1.33.

- a.) Regulatory Guide 1.33, Appendix A, requires the use of procedures for the performance of maintenance that could affect the performance of safety-related equipment.

Procedure BwOP DG-5, "Diesel Generator Oil Addition," step F.4.a states that oil should be added to blue line on the crankcase level sight glass.

Procedure BwAP 100-20, "Procedure Use and Adherence," step D.8.d.1 requires the user to review the procedure prior to performance.

Procedure BwAP 100-20, "Procedure Use and Adherence," step D.8.d.2 requires that the procedure be available at the location.

Contrary to the above, on December 19, 1996, the 2B diesel generator crankcase oil level was not filled to the blue line on the crankcase sightglass, the operators performing the oil addition did not review the procedure prior to performance, and the operators performing the addition did not have a copy of the procedure at the location.

- b.) Regulatory Guide 1.33, Appendix A, requires the use of procedures for the control of maintenance.

BwWP 800-6, "Withdrawal, Marking and Return of Safety, American Society of Mechanical Engineers (ASME) Code, and Regulatory Related Items," Revision 6, step F.2.c stated in part that when a red tag is issued with a safety-related item the tag is to remain with the item until installation.

Contrary to the above, on December 5, 1996, the tag required to maintain traceability of a safety-related item was removed prior to non-licensed operators receiving and installing the replacement of part of the high efficiency performance air (HEPA) filter in the "C" train of the auxiliary building ventilation nonaccessible plenum.

- c.) Regulatory Guide 1.33, Appendix A; requires the use of procedures for procedure review and approval.

BwAP 1300-10, "Permanent Procedure Preparation, Revision, Deletion, and Approval," Revision 2E2, Step 4.h.1.d, states that a copy of the changed page(s) shall be stapled to the affected page(s) in the field.

Contrary to the above, on December 31, 1996, the inspector was informed during the performance of 2 BwVS 5.2.f.3-2, "ASME Surveillance Requirements For Residual Heat Removal Pump 2RH01PB," Revision 3E1 by the system engineer that an approved change to the procedure had not been attached per BwAP 1300-10.

- d.) Regulatory Guide 1.33, Appendix A, requires the use of procedures for the control of maintenance.

BwAP 1600-1, "Action/Work Request Processing Procedure," Revision 30E2, step C.15.a.6 has a note that states a copy of the procedures for the work performed was part of the minimum requirements for a work package field copy.

Contrary to the above, on January 2, 1997, the inspectors observed the removal of the 1C heater drain pump motor and coupling with no work package at the job site.

- e.) Technical Specification 6.8.1.a requires that procedures be established, implemented, and maintained for activities covered in Appendix A of Regulatory Guide 1.33. Regulatory Guide 1.33, Appendix A, requires the use of procedures for the operation of refueling equipment.

Commonwealth Edison Nuclear Procedure Form 86-2616, "PWR Station Nuclear Component Transfer List" (NCTL), gave the required location of each fuel assembly within the spent fuel pool.

Procedure BwFP FH-4, "Fuel Movement In Spent Fuel Pool," Revision 4, required triple verification and defined it as "the process utilized to verify correct positioning of a fuel assembly compared to the NCTL, by a minimum of two fuel handlers and a qualified Fuel handling Supervisor, all of whom have independently verified and concur with the fuel assembly position."

Contrary to the above, on December 1, 1996, fuel assemblies S31W and T70X were placed in locations other than as specified in the NCTL and fuel handlers did not check the NCTL during fuel movement to verify fuel assemblies were being moved to the specified location.

- f.) Regulatory Guide 1.33, Appendix A, requires the use of procedures for the control of equipment.

Braidwood Procedure, BwAP 100-10, "Conduct of Station Personnel," Revision 2 provides requirements for securing carts and moveable equipment in areas of the plant containing safety-related equipment for the purpose of preventing damage to safety-related components.

Braidwood Procedure, BwRP 6210-24, "Installation, Removal, and Tracking of Temporary Shielding," Revision 1, provides requirements for use of temporary shielding in the plant. Step f.2 of BwRP 6210-24 requires removal of temporary shielding within 90 days unless otherwise specified by the engineering evaluation. The attachment to temporary shielding request 96-104, which provided the engineering evaluation of the installation, Step 5 stated that "the racks shall be tracked and removed when the shielding is no longer required."

Contrary to the above, between November 4, 1996 and January 2, 1997, numerous carts and moveable equipment were identified as potentially damaging to safety-related components as they were either not secured, inadequately secured, or secured to safety-related equipment in areas of the plant specifically covered by the requirements of BwAP 100-10. Also, temporary shielding installed under shielding request 96-104 and on moveable carts was not properly configured, administratively controlled, or physically restrained to protect nearby safety-related equipment from the shielding or the cart during the time frame of June 20, 1996 to December 9, 1996.

- g.) Regulatory Guide 1.33, Appendix A, requires the use of procedures for access control to radiation areas.

Procedure BwRP 5010-1, "Radiological Posting And Labelling Requirements," Revision 5, states "if an area exists which is accessible to personnel, and for which radiation levels exceed 5 millirem (mrem) in any 1 hour at 30 centimeters from the source, then post "CAUTION, RADIATION AREA" signs at any entrance to the area."

Contrary to the above, on January 2, 1997, the Unit 1 Moderating Heat Exchanger Room was not posted as a radiation area and was not encompassed by any other radiation area even though radiation levels inside the room exceeded 5 mrem per hour.

- h.) Regulatory Guide 1.33, Appendix A, requires the use of procedures for contamination control.

Braidwood Procedure, BwRP 5822-8, "Operation and Calibration of the IPM-7/8 Whole Body Frisking Monitor," Revision 2, provides requirements for use of the friskers when leaving the radiologically protected area and allows two attempts to frisk using the same monitor. Upon a second alarm, radiation protection personnel must be contacted.

Contrary to the above, a security guard was observed on December 18, 1996, performing repeated frisking cycles at different monitors, with subsequent radiation alarms.

This is a Severity Level IV violation (Supplement I) (50-456/457/96021-01a-h).

- 2) 10 CFR Part 50, Appendix B, Criterion XVI, states in part that measures shall be established to assure that conditions adverse to quality such as failures and malfunctions are promptly identified and corrected.

Plant operating personnel were notified of problems associated with the installation of temporary shielding on moveable carts in Unit 1 curved wall area under shielding request 96-104 on November 4, 1996. This shielding was not adequately controlled and could have potentially damaged safety-related components.

Contrary to the above, no action was taken by the licensee to investigate or correct the problems associated with the shielding installation until December 9, 1996, when the licensee was again notified of problems with the installation.

- 3) Part 50.55a(g)(4) requires that all components which are classified as American Society of Mechanical Engineers (ASME) Code Class 3 must meet the requirements set forth in ASME Section XI.

ASME Boiler and Pressure Vessel Code, Section XI, 1983 Winter addendum, Subsections IWB-3112 (c), Table IWB-3410-1, IWB-3522, and IWB-3142 stated in part that a through wall flaw in Class 3 piping was unacceptable for continued service and corrective action was required prior to returning the component to service.

Contrary to the above, on December 23, 1996, the licensee identified a through wall leak on ASME Class 3 piping in the 1A essential service water system (SX). Between December 23 and December 30 the 1A SX train had not been removed from service, no corrective actions had been taken, and the 1A SX system train had not been declared inoperable.

This is a Severity Level IV violation (Supplement I) (50-456/457/96021-03).

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 18th day of February, 1997