

## 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 April 8 through May 20, 1997, three 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 50.59 states, in part, that the licensee may make changes in the facility as described in the safety analysis report without Commission approval provided the change does not involve a technical specification or an unreviewed safety question and a written safety evaluation must be performed and retained which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, on April 18, 1997, the inspectors identified that the licensee had taken the open Unit 2 motor driven feedwater pump discharge isolation valve (2FVW02A) out-of-service for maintenance without first conducting a written safety evaluation. This disabled the valve's automatic function to close on a feedwater isolation signal as described in the Updated Final Safety Analysis Report.

This is a Severity Level IV violation (Supplement I) (50-457/97007-01(DRP)).

2. Technical Specification (TS) 6.8.1.a, states that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements," Revision 2, dated February 1978.
  - a) Regulatory Guide 1.33, Appendix A, requires the use of procedures for the control of maintenance that can affect the performance of safety-related equipment.

SMP-M-04, "Foreign Material Exclusion," Revision 0, Section 6.4.2 requires that covers must be placed on all system breaches when the opening is left unattended or is not required to be open for work, inspection, or testing.

Contrary to the above:

On April 21, 1997, inspectors observed the 1B diesel unattended with foreign material exclusion (FME) covers missing from two of the cam shaft access ports.

On April 25, 1997, inspectors observed that the FME cover was removed from the 1B diesel right cylinder bank and the diesel was unattended.

This is a Severity Level IV violation (Supplement I) (50-456/97007-02a(DRP)).

- b) Regulatory Guide 1.33, Appendix A, describes the use of specific procedures for surveillance tests listed in the technical specifications.

BwVS 0.5-2.SI.2, "Safety Injection System Check Valve Stroke Test," Revision 15, Step F.4.24 requires the recording of the flow rate for 1B SI pump (1SI01PB). This flow rate is the sum of the readings from flow instruments FI-922 and FI-972.

Contrary to the above, the inspectors identified that on April 28, 1997, the test director failed to record and sum the flow rate reading from FI-972 with the flow rate obtained from FI-922. If the flow rate was properly calculated, the acceptance criteria of Step F.4.24 may have been exceeded.

This is a Severity Level IV violation (Supplement I) (50-456/97007-02b(DRP)).

- c) Regulatory Guide 1.33, Appendix A, requires the use of specific procedures for surveillance tests listed in the technical specifications.

BwVS 0.5-2.SI.3-2, "Safety Injection System Check Valve Stroke Test," Revision 8, Step D.2 and TS 4.5.2.h.b. instructs the operator not to exceed a centrifugal charging (CV) pump flow of 550 gallons per minute (gpm) in order to protect the pump against run out.

Contrary to the above, the inspectors identified that on April 28, 1997, during the performance of BwVS 0.5-2.SI.3-2, the test director received indication that 1A CV pump flow was greater than 550 gpm and did not inform the operating crew to secure the pump. This could have led to cavitation and possible pump damage.

This is a Severity Level IV violation (Supplement I) (50-456/97007-02c(DRP)).

- 3. TS 6.8.1.g states, in part, that written procedures shall be established, implemented, and maintained covering activities of the Fire Protection Program.

- a) BwAP 1100-15, "Fire Prevention When Welding, Cutting, Grinding or Performing Open Flame Work (Hot Work)," Revision 7, Step F.2.c.10 instructs the job supervisor to ensure that a fire watch is available throughout the job and at least 30 minutes after. BwAP 1100-15, Step 6a states, in part, that one or more individuals in each welding, grinding, or open

flame work area SHALL be designated to watch for potential fire or smoldering.

Contrary to the above, on April 23, 1997, the inspectors observed a contract worker assigned as the fire watch for welding that was in progress, sitting in the dark under the Unit 1 turbine hood. The inspectors informed the operations shift field supervisor who with another senior reactor operator found the individual asleep (inattentive.)

This is a Severity Level IV violation (Supplement I) (50-456/97007-06a(DRP)).

- b) BwAP 1110-3, "Plant Barrier Impairment Program," Revision 3, Step D.6 states, in part, that a plant barrier impairment should be filled out for any impairment of a barrier. If a door is going to be left unattended a Plant Barrier Impairment (PBI) is required.

Contrary to the above, on April 22, 1997, the inspectors discovered that a fire door from the condensate polisher room to the turbine building on the 401 foot elevation was propped open with a hose passing through it. No PBI had been prepared for the impaired door and no one was in attendance at the door.

This is a Severity Level IV violation (Supplement I) (50-456/97007-06b(DRP)).

- c) BwAP 1100-11, "Fire Prevention for Use of Lumber and Other Combustibles," Revision 7, Step C.3.a states, in part, that prior to moving major transient combustibles that will be left unattended into safety-related areas from normal storage areas, the responsible work group supervisor shall obtain approval from the Fire Marshal or designee.

Contrary to the above, on May 19, 1997, the inspectors found combustible material in the auxiliary building on the 346 foot elevation. No transient fire load permit was found at the location and the inspector, through an interview with fire protection personnel, determined that no transient fire load permit had been obtained.

This is a Severity Level IV violation (Supplement I) (50-456/97007-06c(DRP)).

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 17<sup>th</sup> day of June, 1997