

Commonwealth Edison Company  
Braidwood Generating Station  
Route #1, Box 84  
Braceville, IL 60407-9619  
Tel 815-458-2801



March 6, 2000  
BW000022

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Request for Information concerning Corrective Actions

Reference: Letter from J. A. Grobe (NRC) to O. D. Kingsley (Commonwealth Edison Company), "NRC Office of Investigations Report No. 3-1999-021," dated February 4, 2000.

Results from an investigation of actions taken by a contract radiation protection technician while exiting Braidwood Station were documented in NRC Office of Investigations Report No. 3-1999-021. A summary of the report was transmitted with the Reference letter. This letter requested Commonwealth Edison (ComEd) Company to confirm on the docket the corrective actions that were taken in response to the individual's behavior. The attachment to this letter contains the requested information.

The behavior of the contract worker was contrary to Braidwood Station's policies and expectations associated with properly exiting the site through the security gatehouse portal radiation monitors. The Station had appropriate monitoring mechanisms in place, including video camera surveillance monitoring capability, which enabled Station Radiation Protection personnel to respond appropriately to the incident. Station management recognizes its responsibilities associated with monitoring the activities of contractor personnel on site. Every effort is taken to hire only individuals who are credible and maintain a strong work ethic. However, it is recognized that some individuals may not always exhibit proper behavior at all times. As a result, barriers such as video camera surveillance monitoring have been put in place. Braidwood Station will continue to closely monitor contractor activities, particularly as the site prepares to execute two refueling outages in the current year.

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In accordance with the February 4, 2000, NRC letter, this response is being submitted under oath and affirmation. If there are any questions or comments concerning this letter, please refer them to T. W. Simpkin, Braidwood Regulatory Assurance Manager, at (815) 458-2801, extension 2980.

Respectfully,



Timothy J. Tulon  
Site Vice President  
Braidwood Station

Attachments: Affidavit  
Attachment – Response to EA 2000-010

cc: Director, NRC Office of Enforcement  
NRC Regional Administrator - Region III  
NRC Region III Enforcement Officer  
NRC Senior Resident Inspector – Braidwood Station

STATE OF ILLINOIS )  
COUNTY OF WILL )  
IN THE MATTER OF )  
COMMONWEALTH EDISON (COMED) COMPANY ) Docket Nos.  
BRAIDWOOD STATION - UNITS 1 and 2 ) STN 50-456 and  
 ) STN 50-457

SUBJECT: Response to EA 2000-010

**AFFIDAVIT**

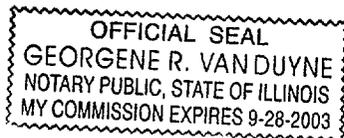
I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

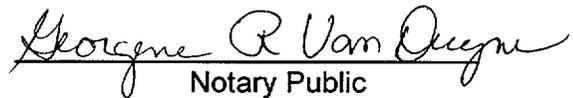
  
\_\_\_\_\_  
Timothy J. Tulon  
Site Vice President  
Braidwood Station

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 6<sup>th</sup> day of

March, 2000.



  
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Notary Public

( OFFICIAL SEAL )

## ATTACHMENT

### RESPONSE TO EA 2000-010 NRC OFFICE OF INVESTIGATIONS REPORT NO. 3-1999-021

On April 28, 1999, a radiation protection technician employed by the contractor Numanco exited Braidwood Station with contamination on his clothing. Video camera surveillance monitoring detected the individual alarming the portal radiation monitors at the security gatehouse approximately 15 times. This inappropriate action was recognized by Station Radiation Protection personnel who promptly responded to the incident.

The Reference letter requested Commonwealth Edison (ComEd) Company to confirm on the docket the corrective actions that were taken in response to the individual's behavior. The information below provides details on the immediate and long-term corrective actions that were taken at Braidwood Station in response to the incident.

#### Immediate Corrective Actions

Following the identification by video camera surveillance monitoring of the inappropriate actions taken by the contract worker, the individual was contacted at his motel and requested to return to the station. Upon his return, the individual's clothing was surveyed and contamination (i.e., approximately 15,000 disintegrations per minute) was discovered on the individual's pant leg. Surveys of the individual's car and motel room detected no spreading of contamination. The event was entered in the Station's Corrective Action Program.

The Braidwood Station Radiation Protection Supervisor met with the individual and with Numanco management representatives to discuss the incident. The individual was not permitted to enter the Radiologically Posted Area (RPA) during the investigation. Numanco subsequently terminated the individual's employment.

The incident was discussed with other Numanco employees on-site to emphasize the importance of following established policies and procedures. In addition, event details were disseminated to the workforce through communications with Braidwood Station supervisors to re-emphasize the requirements for exiting the RPA.

A description of the event was documented in the Station newspaper on May 3, 1999. The article emphasized the fact that the radiation protection technician's behavior was unacceptable and will not be tolerated.

Following the event, the ComEd contract with Numanco was revised to include a performance incentive, part of which includes an incentive for avoiding radiological events.

## ATTACHMENT

### RESPONSE TO EA 2000-010 NRC OFFICE OF INVESTIGATIONS REPORT NO. 3-1999-021

#### Long Term Corrective Actions to Prevent Recurrence

Prior to the next refueling outage, several actions will be taken in response to this incident. For example, the Braidwood Station Radiation Protection Supervisor will meet with Numanco management representatives to discuss expectations associated with work performance and standards. In addition, training will be provided to contractor radiation protection technicians, which will include details of the individual's inappropriate actions. During the next refueling outage, personnel will be stationed at the security gatehouse during selected times to ensure proper techniques are used to check for contamination using the portal radiation monitors.

The Station will continue to use video camera surveillance monitoring during high traffic periods to monitor personnel as they exit the site.

Signs will continue to be posted on the portal monitors stating the actions to be taken following a portal radiation monitor alarm. The signs are located directly adjacent to the alarm indication and were in place at the time of the incident.

A review of the guidance provided to Station workers associated with portal radiation monitor alarms was done to ensure sufficient instruction is provided. It was determined that at the time of the incident, information was provided through Nuclear – General Employee Training (N-GET) (Revision 21), a Radiation Worker Handbook (Revision 1), and a "Pocketbook" for Administrative Excellence (dated April 1998). Although some of these instructions have been revised since the incident, the changes made to the guidance on this subject were insignificant. N-GET, provided to all personnel requiring unescorted access to the Station, will continue to include training material and testing on the proper methods for personal contamination monitoring.

#### Reference

Letter from J. A. Grobe (NRC) to O. D. Kingsley (Commonwealth Edison Company), "NRC Office of Investigations Report No. 3-1999-021," dated February 4, 2000.