November 9, 2005

Mr. Christopher M. Crane President and Chief Nuclear Officer Exelon Nuclear Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2 NRC INTEGRATED INSPECTION REPORT 05000456/2005008; 05000457/2005008

Dear Mr. Crane:

On September 30, 2005, the U. S. Nuclear Regulatory Commission (NRC) completed an integrated inspection at your Braidwood Station, Units 1 and 2. The enclosed report documents the inspection findings which were discussed on October 4, 2005, with Mr. G. Boerschig and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, one NRC-identified finding of very low safety significance (Green) is documented in this report. This finding was determined to involve a violation of NRC requirements. However, because this violation was of very low safety significance and because the issue was entered into your corrective action program, the NRC is treating this finding as a Non-Cited Violation in accordance with Section VI.A.1 of the NRC's Enforcement Policy. Additionally, three licensee identified violations are listed in Section 40A7 of this report.

If you contest the subject or severity of a Non-Cited Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission - Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at the Braidwood facility.

C. Crane

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Sincerely,

/**RA**/

Richard A. Skokowski, Chief Branch 3 Division of Reactor Projects

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

- Enclosure: Inspection Report 05000456/2005008; 05000457/2005008 w/Attachment: Supplemental Information
- cc w/encl: Site Vice President - Braidwood Station Plant Manager - Braidwood Station Regulatory Assurance Manager - Braidwood Station Chief Operating Officer Senior Vice President - Nuclear Services Vice President - Operations Support Vice President - Licensing and Regulatory Affairs **Director Licensing** Manager Licensing - Braidwood and Byron Senior Counsel, Nuclear, Mid-West Regional **Operating Group Document Control Desk - Licensing** Assistant Attorney General Illinois Emergency Management Agency State Liaison Officer Chairman, Illinois Commerce Commission

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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos:	50-456; 50-457
License Nos:	NPF-72; NPF-77
Report No:	05000456/2005008; 05000457/2005008
Licensee:	Exelon Generation Company, LLC
Facility:	Braidwood Station, Units 1 and 2
Location:	35100 S. Route 53 Suite 79 Braceville, IL 60407-9617
Dates:	July 1 through September 30, 2005
Inspectors: N. Sh	 ah, Senior Resident Inspector G. Roach, Resident Inspector R. Ruiz, Acting Resident Inspector J. House, Senior Radiation Specialist R. Jickling, Emergency Preparedness Analyst B. Jorgensen, Consultant R. Langstaff, Reactor Engineer D. McNeil, Reactor Engineer T. Tongue, Project Engineer M. Wilk, Reactor Engineer R. Winter, Reactor Engineer J. Winter, Reactor Engineer J. Roman, Illinois Emergency Management Agency
Approved by:	R. Skokowski, Chief Branch 3 Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000456/2005008, 05000457/2005008; 07/01/2005 - 09/30/2005; Braidwood Station, Units 1 & 2; Other Activities.

This report covers a 3-month period of baseline resident inspection, routine baseline inspection activities, and announced baseline inspections on radiation protection and instrumentation, emergency preparedness, licensed operator requalification, and maintenance rule implementation. In addition, inspections were conducted using Temporary Instruction 2515/161. The inspection was conducted by the resident inspectors, a regional emergency preparedness inspector, a regional radiation specialist, regional engineering specialists, and contractors. One finding of very low safety significance (Green) and associated Non-Cited Violation was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be "Green" or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

Cornerstone: Mitigating Systems

 Green. The inspectors identified a finding of very low safety significance and associated non-cited violation of Braidwood Station Unit 2 Operating License NPF-77, Condition 2.E. This finding was related to the unavailability of the foam-water fire suppression system for the 2A diesel oil storage tank room due to a system blockage. The licensee cleared the blockage and revised applicable procedures to prevent future blockages. The primary cause of this finding was associated with the Problem Identification and Resolution cross-cutting area, in that the licensee failed to take timely corrective action resulting in the foam suppression system for the above room being inoperable for a 5 year period.

This finding was considered more than minor because it affected the Mitigating Systems cornerstone objective to ensure that external factors (i.e., fire, flood, etc.) do not impact the availability, reliability and capability of systems that respond to initiating events. The finding was of very low safety significance (Green) in accordance with Phase 2 of the Fire Protection Significance Determination Process because there was no realistic scenario by which a postulated fire could have affected more than just the support equipment to the affected emergency diesel generator. In addition, the inspectors verified that the redundant train of emergency AC power and associated safety-related structures, systems and components would remain free of fire damage and that safe shutdown capability could be achieved even with the total loss of one diesel oil storage tank room. (Section 4OA5)

B. Licensee-Identified Violations

Three violations of very low safety significance, which were identified by the licensee, were reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. These violations are listed in Section 4OA7 of this report.

REPORT DETAILS

Summary of Plant Status

Unit 1 operated at full power until September 10, 2005, when a forced shutdown was commenced to address increased leakage from the #1 seal of the 1A reactor coolant pump. Unit 1 was restored to the grid on September 17, 2005, and subsequently continued to operate at full power for the remainder of the inspection period.

Unit 2 operated at full power for this inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

a. <u>Inspection Scope</u>

The inspectors performed a walkdown of selected plant areas during a period of extreme high temperatures. The areas selected were those considered "at risk" based on a review of the Updated Final Safety Analysis Report (UFSAR), Technical Specifications (TS) and other design basis documents. The specific areas observed were:

- Units 1 and 2 miscellaneous electrical equipment and engineered safety feature Division 11, 12, 21, and 22 switchgear rooms; and
- Unit 1 and 2 main steam isolation valve rooms.

The inspectors verified that minor issues identified during these inspections were entered into the licensee's corrective action program. Documents reviewed as part of this inspection are listed in the Attachment. This review constituted one sample of this inspection requirement.

b. <u>Findings</u>

No findings of significance were identified.

- 1R04 Equipment Alignment (71111.04)
- .1 Partial Walkdowns
- a. Inspection Scope

The inspectors performed partial walkdowns of the accessible portions of risk-significant system trains during periods when the train was of increased importance due to redundant trains or other equipment being unavailable. The inspectors utilized the valve and electric breaker checklists listed to determine whether the components were properly positioned and that support systems were aligned as needed. The inspectors

also examined the material condition of the components and observed operating parameters of equipment to determine whether there were any obvious deficiencies. The inspectors reviewed Condition Reports (CRs) associated with the train to determine whether those documents identified issues affecting train function. The inspectors used the information in the appropriate sections of the TS and the UFSAR to determine the functional requirements of the system. The inspectors also reviewed the licensee's identification of and the controls over the redundant risk-related equipment required to remain in service. Documents reviewed during this inspection are listed in the Attachment.

The inspectors completed four samples of this requirement by walkdowns of the following trains:

- 2B essential service water pump with the 2A essential service water pump out-ofservice;
- 1B emergency diesel generator with the 1A emergency diesel generator out-of-service;
- Unit 1 component cooling alignment with the 1A component cooling pump out-of-service; and
- Unit 1 electrical line-up with system auxiliary transformer 142-1 out-of-service.
- b. Findings

No findings of significance were identified.

- .2 Complete Walkdowns
- a. Inspection Scope

The inspectors performed a complete system walkdown of the Unit 1 essential service water system. This system was selected because it is considered risk-significant from an initiating event and mitigating systems standpoint.

In addition to the walkdown, the inspectors reviewed the following:

- selected operating procedures regarding system configuration;
- the UFSAR, TS, and other selected design bases documentation regarding the system;
- CRs for the system initiated within the last year; and
- outstanding system work orders (WOs).

Documents reviewed as part of this inspection are listed in the Attachment. This walkdown represented one inspection sample.

b. <u>Findings</u>

No findings of significance were identified.

1R05 <u>Fire Protection</u> (71111.05)

Quarterly Inspection

a. Inspection Scope

The inspectors conducted fire protection walkdowns which were focused on availability, accessibility, and the condition of fire fighting equipment, the control of transient combustibles and ignition sources, and on the condition and operating status of installed fire barriers. The inspectors selected fire areas for inspection based on their overall contribution to internal fire risk, as documented in the Individual Plant Examination of External Events with later additional insights or their potential to impact equipment which could initiate a plant transient or be required for safe shutdown. The inspectors used the Fire Protection Report, Revision 21, to determine: whether fire hoses and extinguishers were in their designated locations and available for immediate use; that fire detectors and sprinklers were unobstructed; that transient material loading was within the analyzed limits; and that fire doors, dampers, and penetration seals appeared to be in satisfactory condition.

The inspectors completed nine samples of this inspection requirement during the following walkdowns:

- general areas of the Units 1 and 2 auxiliary building;
- accessability of outside fire hydrants;
- welding inside the 1A emergency diesel generator room;
- transient combustibles in 1B and 2B diesel driven auxiliary feedwater pump rooms;
- Unit 2 upper and lower cable spreading rooms;
- Unit 1 miscellaneous electrical equipment room;
- 1A and 1B diesel oil storage tank (DOST) rooms;
- 2A and 2B DOST rooms; and
- 0A train control room ventilation room.

The inspectors verified that minor issues identified during the inspection were entered into the licensee's corrective action program by reviewing the documents listed in the Attachment.

b. <u>Findings</u>

No findings of significance were identified.

1R06 Flood Protection Measures (71111.06)

Internal Flooding Review

a. Inspection Scope

The inspectors evaluated the internal flooding controls for the following areas:

- turbine building general area proximate to the Unit 0 and Unit 1 instrument air dryers and station air compressors; and
- 1A and 1B essential service water pump rooms.

These areas constituted two samples of this inspection requirement. The turbine building general area was selected, because it was considered a high risk area in the licensee's internal flooding analysis. The 1A and 1B essential service water pump rooms were selected, because of planned maintenance which required that the licensee remove flood mitigation barriers for an extended period.

The inspectors reviewed the licensee's design basis assumptions for flooding in these areas and performed walkdowns to assess the validity of these assumptions. The inspectors also observed the licensee's flooding compensatory actions during the essential service water pump work. Those documents reviewed during this inspection are listed in the Attachment.

b. Findings

No findings of significance were identified.

1R07 <u>Heat Sink Performance</u> (71111.07)

Annual Review

a. Inspection Scope

The inspectors completed one sample by observing the as found inspection and cleaning of the 2A essential service water pump lube oil cooler. The inspectors observed the as found condition of the cooler and portions of the licensee's cleaning and return-to-service inspection. The inspectors also reviewed past licensee inspection data for this cooler to determine if there was an adverse trend. Those documents reviewed during this inspection are listed in the Attachment.

The inspectors used the guidance in NRC Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment," to perform this review.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Regualification Program (71111.11)

.1 Quarterly Review of Testing/Training Activity

a. Inspection Scope

The inspectors observed operating crew performance during evaluated simulator out-ofthe-box scenario, Braidwood Station Licensed Operator Requalification Simulator Scenario Number 0546, "Evaluated Emergency Preparedness Duties/ Failed Fission Product Barriers/ General Emergency," Revision 0.

The inspectors evaluated crew performance in the following areas:

- clarity and formality of communications;
- ability to take timely actions in the safe direction;
- prioritization, interpretation, and verification of alarms;
- procedure use;
- control board manipulations;
- oversight and direction from supervisors; and
- group dynamics.

Crew performance in these areas was compared to licensee management expectations and guidelines.

The inspectors verified that the crew completed the critical tasks listed in the simulator guide. The inspectors also compared simulator configurations with actual control board configurations. For any weaknesses identified, the inspectors observed the licensee evaluators to determine whether they also noted the issues and discussed them in the critique at the end of the session. Those documents reviewed during this inspection are listed in the Attachment. This review constituted one sample of this inspection requirement.

b. Findings

No findings of significance were identified.

- .2 Facility Operating History
- a. <u>Inspection Scope</u>

The inspectors reviewed the plant's operating history from August 2003 through July 2005 to assess whether the Licensed Operator Requalification Training (LORT) program had identified and addressed operator performance deficiencies at the plant.

b. <u>Findings</u>

No findings of significance were identified.

.3 <u>Biennial Review of Licensed Operator Regualification Program</u>

a. Inspection Scope

The inspectors performed a biennial inspection of the licensee's LORT test/examination program. The operating examination material reviewed consisted of five operating tests, each containing four dynamic simulator scenarios and ten job performance measures. The written examinations reviewed consisted of five written examinations and five static simulator examinations, each containing approximately 20 questions. The inspectors reviewed the annual regualification operating test and biennial written examination material to evaluate general quality, construction, and difficulty level. The inspectors assessed the level of examination material duplication from week-to-week during the current year operating test, and compared the operating test material from this year's operating tests (2005) with last year's operating tests (2004). The annual operating tests were conducted in August/September 2004 and August/September/October 2005. The examiners assessed the amount of written examination material duplication from week-to-week for the written examination administered in June/July 2005. The inspectors reviewed the methodology for developing the examinations, including the LORT program 2-year sample plan, probabilistic risk assessment insights, previously identified operator performance deficiencies, and plant modifications.

b. Findings

No findings of significance were identified.

.4 Licensee Administration of Regualification Examinations

a. <u>Inspection Scope</u>

The inspectors observed the administration of a requalification operating test to assess the licensee's effectiveness in conducting the test. The inspectors assessed the facility evaluators' ability to determine adequate crew performance and individual performance using objective, measurable standards. The inspectors evaluated the performance of one shift crew in parallel with the facility evaluators during four dynamic simulator scenarios and evaluated various licensed crew members concurrently with facility evaluators during the administration of several job performance measures. The inspectors observed the training staff personnel administer the operating test, including conducting pre-examination briefings, evaluations of operator performance, and individual and crew evaluations upon completion of the operating test. The inspectors evaluated the ability of the simulator to support the examinations. A specific evaluation of simulator performance was conducted and documented under Section 1R11.7, "Conformance With Simulator Requirements Specified in 10 CFR 55.46," of this report.

b. Findings

No findings of significance were identified.

.5 Licensee Training Feedback System

a. Inspection Scope

The inspectors assessed the methods and effectiveness of the licensee's processes for revising and maintaining its LORT program up to date, including the use of feedback from plant events and industry experience information. The inspectors reviewed the licensee's quality assurance oversight activities, including licensee training department self-assessment reports. The inspectors evaluated the licensee's ability to assess the effectiveness of its LORT program and their ability to implement appropriate corrective actions.

b. Findings

No findings of significance were identified.

.6 <u>Licensee Remedial Training Program</u>

a. <u>Inspection Scope</u>

The inspectors assessed the adequacy and effectiveness of the remedial training conducted since the previous biennial requalification examinations and the training planned for the current examination cycle to ensure that they addressed weaknesses in licensed operator or crew performance identified during training and plant operations. The inspectors reviewed remedial training procedures and individual remedial training plans.

b. Findings

No findings of significance were identified.

- .7 <u>Conformance With Operator License Conditions</u>
- a. Inspection Scope

The inspectors reviewed the facility and individual operator licensees' conformance with the requirements of 10 CFR Part 55. The inspectors reviewed the facility licensee's program for maintaining active operator licenses and to assess compliance with 10 CFR 55.53 (e) and (f). The inspectors reviewed the procedural guidance and the process for tracking on-shift hours for licensed operators and which control room positions were granted credit for maintaining active operator licenses. The inspectors reviewed the facility licensee's LORT program to assess compliance with the requalification program requirements as described by 10 CFR 55.59 (c). Additionally, medical records for 15 licensed operators were reviewed for compliance with 10 CFR 55.53 (i).

b. Findings

No findings of significance were identified.

.8 Conformance With Simulator Requirements Specified in 10 CFR 55.46

a. Inspection Scope

The inspectors assessed the adequacy of the licensee's simulation facility (simulator) for use in operator licensing examinations and for satisfying experience requirements as prescribed in 10 CFR 55.46, "Simulation Facilities." The inspectors also reviewed a sample of simulator performance test records (i.e., transient tests, scenario test and discrepancy resolution validation test), simulator discrepancy and modification records, and the process for ensuring continued assurance of simulator fidelity in accordance with 10 CFR 55.46. The inspectors reviewed and evaluated the discrepancy process to ensure that simulator fidelity was maintained. Open simulator discrepancies were reviewed for importance relative to the impact on 10 CFR 55.45 and 55.59 operator actions as well as on nuclear and thermal hydraulic operating characteristics. The inspectors conducted interviews with members of the licensee's simulator staff about the configuration control process and completed the Inspection Procedure 71111.11, Appendix C, checklist to evaluate whether or not the licensee's plant-referenced simulator was operating adequately as required by 10 CFR 55.46 (c) and (d).

b. Findings

No findings of significance were identified.

- 1R12 <u>Maintenance Effectiveness</u> (71111.12)
- 1. <u>Routine Inspection</u>
- a. <u>Inspection Scope</u>

The inspectors reviewed the licensee's overall maintenance effectiveness for selected plant systems. This evaluation consisted of the following specific activities:

- observing the conduct of planned and emergent maintenance activities where possible;
- reviewing selected CRs, open WOs, and control room log entries in order to identify system deficiencies;
- reviewing licensee system monitoring and trend reports;
- attending various meetings throughout the inspection period where the status of maintenance rule activities was discussed;
- a partial walkdown of the selected system; and
- interviews with the appropriate system engineer.

The inspectors also reviewed whether the licensee properly implemented Maintenance Rule, 10 CFR 50.65, for the chosen systems. Specifically, the inspectors determined whether:

- the system was scoped in accordance with 10 CFR 50.65;
- performance problems constituted maintenance rule functional failures;
- the system had been assigned the proper safety significance classification;
- the system was properly classified as (a)(1) or (a)(2); and
- the goals and corrective actions for the system were appropriate.

The above aspects were evaluated using the maintenance rule program and other documents listed in the Attachment. The inspectors also verified that the licensee was appropriately tracking reliability and/or unavailability for the systems.

The inspectors completed three samples in this inspection requirement by reviewing the following systems:

- Units 1 and 2 essential service water pumps;
- Units 1 and 2 emergency diesel generators; and
- Units 1 and 2 component cooling system.
- b. <u>Findings</u>

No findings of significance were identified.

- 2. <u>Periodic Evaluation</u>
- a. Inspection Scope

The inspectors examined the periodic evaluation report completed for the period of November 2002 through April 2004. To evaluate the effectiveness of (a)(1) and (a)(2) activities, the inspector examined a sample of (a)(1) Action Plans, Performance Criteria, Functional Failures, and CRs. These same documents were reviewed to verify that the threshold for identification of problems was at an appropriate level and the associated corrective actions were appropriate. Also, the inspectors reviewed the maintenance rule procedures and processes. Those documents reviewed during this inspection are listed in the Attachment. The inspectors focused the inspection on the following four systems (samples):

- auxiliary power system;
- component cooling system;
- reactor system; and
- auxiliary feedwater system.

The inspectors verified that the periodic evaluation was completed within the time restraints defined in 10 CFR 50.65 (once per refueling cycle, not to exceed 24 months). The inspectors also ensured that the licensee reviewed its goals, monitored Structures, Systems, and Components (SSCs) performance, reviewed industry operating experience, and made appropriate adjustments to the maintenance rule program as a result of the above activities.

The inspectors verified that:

- the licensee balanced reliability and unavailability during the previous refueling cycle, including a review of high safety significant SSCs;
- (a)(1) goals were met, that corrective action was appropriate to correct the defective condition, including the use of industry operating experience, and that (a)(1) activities and related goals were adjusted as needed; and

 the licensee has established (a)(2) performance criteria, examined any SSCs that failed to meet their performance criteria, and reviewed any SSCs that have suffered repeated maintenance preventable functional failures including a verification that failed SSCs were considered for (a)(1).

In addition, the inspectors reviewed maintenance rule self-assessments that addressed the maintenance rule program implementation.

b. Findings

No findings of significance were identified.

1R13 <u>Maintenance Risk Assessments and Emergent Work Control</u> (71111.13)

a. Inspection Scope

The inspectors reviewed the licensee's management of plant risk during emergent maintenance activities or during activities where more than one significant system or train was unavailable. The activities were chosen based on their potential impact on increasing the probability of an initiating event or impacting the operation of safety-significant equipment. The inspections were conducted to determine whether evaluation, planning, control, and performance of the work were done in a manner to reduce the risk and minimize the duration where practical, and that contingency plans were in place where appropriate.

The licensee's daily configuration risk assessment records, observations of operator turnover and plan-of-the-day meetings, and observations of work in progress, were used by the inspectors to verify that the equipment configurations were properly listed, that protected equipment were identified and were being controlled where appropriate, that work was being conducted properly, and that significant aspects of plant risk were being communicated to the necessary personnel.

In addition, the inspectors reviewed selected issues, listed in the Attachment, that the licensee encountered during the activities, to determine whether problems were being entered into the corrective action program with the appropriate characterization and significance.

The inspectors completed nine samples by reviewing the following activities:

- increased seal leakoff flow from the #1 seal for the 1A reactor coolant pump;
- availability of the Units 1 and 2 ultimate heat sink during an extended drought and extreme hot weather;
- crane operations proximate to the Unit 1 unit auxiliary, main power, and system auxiliary transformers;
- unexpected response during Unit 1 main turbine thrust bearing trip testing and troubleshooting;
- planned maintenance on the 1A emergency diesel generator during a period of extreme hot weather and increased electrical grid demand;

- planned maintenance on the 1A component cooling water and service water pumps;
- seal leakoff flow from the #1 seal of the 1A reactor coolant pump in excess of the vendor recommended maximum value, resulting in Unit 1 shutdown/cooldown and replacement of reactor coolant pump 1A #1 seal;
- Unit 1 system auxiliary transformer maintenance outage coinciding with severe thunderstorm activity; and
- draining and cleaning of the 1B residual heat removal discharge and suction piping for dose mitigation.
- b. Findings

No findings of significance were identified.

- 1R14 Operator Performance During Non-Routine Evolutions and Events (71111.14)
- a. <u>Inspection Scope</u>

The inspectors completed three samples by observing the following events:

- failure of Unit 2 main generator exciter temperature control valve, 2WS143;
- failure of Unit 1 main turbine thrust bearing wear trip test line to depressurize during routine surveillance testing; and
- failure of a test switch during surveillance testing of the unit 1 main steam isolation valves logic.

The inspectors observed the control room response, interviewed plant operators and reviewed plant records including control room logs, operator turnovers, and CRs. The inspectors verified that the control room response was consistent with station procedures and that identified discrepancies were captured in the corrective action program. Corrective action documents reviewed as part of this inspection are listed in the Attachment.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors evaluated plant conditions and selected CRs for risk-significant components and systems in which operability issues were questioned. These conditions were evaluated to determine whether the operability of components was justified. The inspectors compared the operability and design criteria in the appropriate section of the UFSAR to the licensee's evaluations presented in the CRs and documents listed in the Attachment to verify that the components or systems were operable. The inspectors also conducted interviews with the appropriate licensee system engineers and

conducted plant walkdowns, as necessary, to obtain further information regarding operability questions.

The inspectors completed eight samples by reviewing the following operability evaluations and conditions:

- failure to quarterly test grout prior to use in emergency diesel generator 1B space wall penetration;
- hardening of grease on safety injection and component cooling water valve actuators;
- 2B DOST low level alarm during 2B emergency diesel generator monthly run with low out of sight levels in on-site supply tanks;
- multiple diesel engine jacket water expansion tank overflow events during engine run for both the 1B and 2B diesel driven auxiliary feedwater pumps;
- an aggregate review of CRs 365953, "System Frequency Alarm Relay Failed Calibration," 367965, "Question About LCO During Diesel Generator Testing," and 364936, "Check Valve Orientation Not Per Vendor Recommendation." This review constituted one inspection sample;
- review of plant scaffolding and its impact on adjacent systems;
- oil leakage from a hydraulic snubber associated with the 1B steam generator; and
- potential inoperability of the residual heat removal system based on industry operating experience from the Wolf Creek nuclear station.
- b. Findings

No findings of significance were identified.

- 1R19 <u>Post-Maintenance Testing</u> (71111.19)
- a. Inspection Scope

The inspectors reviewed post-maintenance testing activities associated with important mitigating systems, barrier integrity, and support systems to ensure that the testing adequately demonstrated system operability and functional capability. The inspectors used the appropriate sections of the TS and UFSAR, as well as the WOs for the work performed, to evaluate the scope of the maintenance and to determine whether the post-maintenance testing was performed adequately, demonstrated that the maintenance was successful, and that operability was restored. The inspectors determined whether the testing met the frequency requirements; that the tests were conducted in accordance with the procedures, including establishing the proper plant conditions and prerequisites; that the test acceptance criteria were met; and that the results of the tests were properly reviewed and recorded. The activities were selected based on their importance in demonstrating mitigating systems capability and barrier integrity. The inspectors verified that minor issues identified during the inspection were entered into the licensee's corrective action program by reviewing the documents in the Attachment.

Six samples were completed by observing post-maintenance testing of the following components:

- 2A emergency service water pump American Society of Mechanical Engineers (ASME) test run following system valve and pump lube oil cooler maintenance;
- 1A emergency diesel generator starting system lockout test, fast start test, and governor overspeed test following significant maintenance outage;
- 1B emergency service water pump ASME test run following system electrical and pump lube oil cooler maintenance;
- test run of 2VD02CD 2B DOST room exhaust fan, following calibration of differential pressure switch 2PDS-VD073;
- ASME test run of 1A component cooling water pump following motor replacement; and
- VOTES testing and return to service of the essential service water crossover supply from Unit 2 to the common component cooling water heat exchanger isolation valve 2SX005.
- b. Findings

No findings of significance were identified.

- 1R20 <u>Refueling and Other Outage Activities</u> (71111.20)
- a. <u>Inspection Scope</u>

The inspectors observed the licensee's performance during a forced outage on Unit 1, following increased leakage from the #1 seal of the 1A reactor coolant pump. The outage began on September 10 and concluded on September 17, 2005. This inspection constituted one sample of the inspection requirement.

Inspection activities included a review of the outage schedule, safe shutdown plan and administrative procedures governing the outage and periodic observations of equipment alignment, risk control, maintenance, and control room activities. In particular, the inspectors observed whether the licensee effectively managed elements of shutdown risk pertaining to reactivity control, decay heat removal, inventory control, electrical power control, containment integrity, and vital support systems, as applicable.

On a daily basis, the inspectors attended control room operator and outage management turnover meetings to determine whether shutdown risk and plant status were well understood and communicated, and performed walkdowns of the main control room to observe the alignment of systems important to shutdown risk. The inspectors also performed the following specific activities:

- reviewed the detailed outage schedule and risk control plans;
- observed the control room staff during portions of the plant shutdown and cooldown;
- reviewed the results of the licensee's initial containment Mode 3 walkdowns for evidence of reactor coolant leakage;
- performed a walkdown to observe containment cleanliness prior to Mode 4 entry; and
- observed the control room staff during reactor startup.

The inspectors checked to see that minor issues identified during the inspection were entered into the licensee's corrective action program. Documents reviewed during these inspection activities are listed in the Attachment.

b. Findings

No findings of significance were identified.

- 1R22 <u>Surveillance Testing</u> (71111.22)
- a. Inspection Scope

The inspectors reviewed surveillance testing activities associated with important mitigating systems, barrier integrity, and support systems to ensure that the testing adequately demonstrated system operability and functional capability. The inspectors used the appropriate sections of the TS and UFSAR, as well as the WOs for the work performed, to evaluate the scope of the maintenance and to determine whether the surveillance testing was performed adequately, demonstrated that the maintenance was successful, and that operability was restored. The inspectors determined whether the testing met the frequency requirements; that the tests were conducted in accordance with the procedures, including establishing the proper plant conditions and prerequisites; that the test acceptance criteria were met; and that the results of the tests were properly reviewed and recorded. The activities were selected based on their importance in demonstrating mitigating systems capability, barrier integrity and the initiating events cornerstone. The inspectors verified that minor issues identified during the inspection were entered into the licensee's corrective action program by reviewing the documents in the Attachment.

Five samples were completed by observing and evaluating the following surveillance tests:

- Unit 1 K608B slave relay surveillance;
- Unit 2 emergency core cooling system vent and valve and containment integrity valve surveillance;
- Unit 1 solid state protection system train B surveillance;
- Unit 1 feedwater isolation valve (1FW039 A-D) stroke testing following missed surveillance; and
- Unit 2 24A feedwater heater level control switch repair and calibration.
- b. Findings

No findings of significance were identified.

1R23 <u>Temporary Plant Modifications</u> (71111.23)

a. <u>Inspection Scope</u>

The inspectors reviewed the following temporary modifications:

- furmanite repair of steam leak from flange in Unit 2 feedwater heater 27B emergency level control piping; and
- freeze seal of emergency service water system piping in support of 2SX1820A valve repair.

For each modification, the inspectors reviewed the associated design change paperwork, attended applicable prejob briefings and observed installation and/or removal. The inspectors also reviewed contingency plans, as applicable, for modifications supporting continued component operability or reliability. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's corrective action program. Those documents reviewed during this inspection are listed in the Attachment. This review constituted two samples of this inspection requirement.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

- 1EP2 <u>Alert and Notification System Testing</u> (71114.02)
- a. <u>Inspection Scope</u>

The inspectors discussed with Emergency Preparedness staff the operation, maintenance, and periodic testing of the Alert and Notification System in the Braidwood Station's plume pathway Emergency Planning Zone to determine whether the Alert and Notification System equipment was adequately maintained and tested in accordance with Emergency Plan commitments and procedures. The inspectors reviewed records of 2004 and 2005 siren reports, as well as January 2004 through July 2005 operability test results. Those documents reviewed during this inspection are listed in the Attachment.

These activities completed one inspection sample.

b. Findings

No findings of significance were identified.

1EP3 <u>Emergency Response Organization (ERO) Augmentation</u> (71114.03)

a. Inspection Scope

The inspectors reviewed and discussed with plant Emergency Preparedness staff the procedures that included the primary and alternate methods of initiating an ERO activation to augment the on shift ERO and the provisions for maintaining the plant's ERO call-out roster. The inspectors also reviewed reports and a sample of corrective action program records of unannounced off-hour augmentation tests, which were conducted approximately monthly between May 2003 and June 2005, to determine the adequacy of the drills' critiques and associated corrective actions. The inspectors also reviewed the Emergency Preparedness training records of a sample of 17 Braidwood Station ERO personnel, who were assigned to key and support positions, to determine whether they were currently trained for their assigned ERO positions. Those documents reviewed during this inspection are listed in the Attachment.

These activities completed one inspection sample.

b. Findings

No findings of significance were identified.

1EP5 <u>Correction of Emergency Preparedness Weaknesses and Deficiencies</u> (71114.05)

a. <u>Inspection Scope</u>

The inspectors reviewed the Nuclear Oversight staff's 2003, 2004, and 2005 audit reports to ensure that these audits complied with the requirements of 10 CFR 50.54(t) and that the licensee adequately identified and corrected deficiencies. The inspectors also reviewed critique reports and samples of corrective action program records associated with the actual Unusual Event declared on March 28, 2005, and the 2004 biennial exercise, in order to verify that the licensee fulfilled its commitments and to evaluate the licensee's efforts to identify, track, and resolve weaknesses and deficiencies identified during theses activities. Additionally, the inspectors reviewed a sample of Emergency Preparedness items, condition reports, and action requests related to the facility's Emergency Preparedness program to determine whether corrective actions were acceptably completed. Documents reviewed are listed in the Attachment.

These activities completed one inspection sample.

b. <u>Findings</u>

No findings of significance were identified.

1EP6 Drill Evaluation

a. Inspection Scope

The inspectors observed licensee performance during an evaluated emergency response drill. Observations included manning of the Technical Support Center, turnover of command and control to and from the Technical Support Center, event classification and notification, and development of protective action recommendations. The inspectors also observed Operations Support Center activities and accompanied one in-plant team. The inspectors checked to see that deficiencies noted during the drill, by either the inspectors or licensee evaluators, were entered into the licensee's corrective action program. The inspectors also attended portions of the post drill critique for the Technical Support Center and Operations Support Center crews. This activity constituted one inspection sample.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

- 2OS1 Access Control to Radiologically Significant Areas (71121.01)
- .1 <u>Problem Identification and Resolution</u>
- a. Inspection Scope

The inspectors reviewed the licensee's self-assessments, audits, and condition reports (CR) related to the access control program to determine if identified problems were entered into the corrective action program for resolution. This sample was credited in Inspection Report 05000456/2005003; 05000457/2005003.

Corrective action reports related to access controls and high radiation area (HRA) radiological incidents (non-performance indicator occurrences identified by the licensee in HRAs less than 1 Rem/hr) were reviewed and are listed in the Attachment. Staff members were interviewed and corrective action documents were reviewed to determine if follow-up activities were being conducted in an effective and timely manner commensurate with their importance to safety and risk based on the following:

- initial problem identification, characterization, and tracking;
- disposition of operability/reportability issues;
- evaluation of safety significance/risk and priority for resolution;
- identification of repetitive problems;
- identification of contributing causes;
- identification and implementation of effective corrective actions;
- resolution of NCVs tracked in the corrective action system; and
- implementation/consideration of risk-significant operational experience feedback.

This sample was credited in Inspection Report 05000456/2005003; 05000457/2005003.

b. Findings

No findings of significance were identified.

2OS3 Radiation Monitoring Instrumentation and Protective Equipment (71121.03)

- .1 Calibration and Operability of Radiation Instrumentation
- a. <u>Inspection Scope</u>

The inspectors reviewed records of calibration, operability, and alarm set points (where applicable) of selected instruments including containment radiation monitors, portable hand-held survey instruments and personal monitoring devices including the whole body counter. In addition, an independent audit of the licensee's vendor calibration facility was evaluated for adequacy. Those documents reviewed during this inspection are listed in the Attachment. This sample was credited in Inspection Report 05000456/2004004; 05000457/2004004.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

Cornerstones: Emergency Preparedness

Emergency Preparedness Strategic Areas

a. Inspection Scope

The inspectors reviewed the licensee's records associated with the three Emergency Preparedness performance indicators listed below. The inspectors verified that the licensee accurately reported these indicators in accordance with relevant procedures and Nuclear Energy Institute guidance endorsed by NRC. Specifically, the inspectors reviewed licensee records associated with performance indicators data reported to the NRC for the period October 2004 through June 2005. Reviewed records included: procedural guidance on assessing opportunities for the three performance indicators; assessments of performance indicator opportunities during pre-designated Control Room Simulator training sessions, the 2004 biennial exercise, and other drills; revisions of the roster of personnel assigned to key ERO positions; and results of periodic Alert and Notification System operability tests. Those documents reviewed during this inspection are listed in the Attachment. The following performance indicators which constitute three samples were reviewed:

<u>Common</u>

• Alert and Notification System (1 sample);

- ERO Drill Participation; and
- Drill and Exercise Performance.
- b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems (71152)

- .1 <u>Routine Review of Identification and Resolution of Problems</u>
- a. <u>Inspection Scope</u>

As discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to determine that they were being entered into the licensee's corrective action system at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and addressed. Minor issues entered into the licensee's corrective action system as a result of inspectors' observations are generally denoted in the list of documents reviewed at the back of the report.

b. Findings

No findings of significance were identified.

.2 <u>Annual Sample - Plant Transients Induced by Secondary System Events</u>

Introduction

The inspectors reviewed the adequacy of the licensee's corrective actions regarding several instances of secondary side transients resulting in automatic or operator initiated plant power reductions that have occurred since November 2004. The inspectors reviewed the cause of each event to determine if the licensee's corrective actions were effective at preventing repeat failures. Those documents reviewed during this inspection are listed in the Attachment. This activity completed one sample.

- a. <u>Prioritization and Evaluation of Issues</u>
- (1) Inspection Scope

The inspectors assessed the licensee's evaluation and disposition of performance issues, and application of risk insights for prioritization of issues.

(2) Observations

The inspectors noted that each event was captured in a CR and was assigned a priority consistent with its significance. Collectively, the licensee had identified a trend with the number of events and had initiated a common-cause evaluation. This evaluation also

addressed whether similar issues had occurred in the industry. The results of this evaluation were presented to the station Plant Health Committee for review.

The licensee identified that the dominant event initiator was a feedwater heater string extraction steam isolation caused by a failure of the automatic level control system to maintain shell-side level in the normal control band or a spurious, vibration induced high level indication from adjacent maintenance. The inspectors noted that the licensee had sufficiently analyzed each event to obtain a good understanding of the specific event causal factors. The inspectors also noted that the Plant Health Committee had adequately challenged the conclusions of the common-cause evaluation and the recommended corrective actions.

b. <u>Effectiveness of Corrective Actions</u>

(1) Inspection Scope

The inspectors reviewed the individual corrective actions for each of the specific events and the recommended corrective actions following the common-cause evaluation.

(2) Observations

The licensee has discontinued the use of certain vendor made components in the level control system in favor of a different vendor whose components have been successfully used at another facility. They established a testing program to check for level control valve binding, created procedural controls that established physical boundaries around the level controllers when performing maintenance on adjacent systems, and created an action to review the use of a 3-second time delay circuit in the high-level isolation logic to prevent spurious signals from causing a heater string isolation. The inspectors noted that these actions appeared reasonable to address the specific events reviewed. In particular, the inspector observed the effective use of barriers around the level controllers during periods of maintenance, during plant walkdowns.

The licensee could not identify a generic cause for the failure of the automatic level control system to maintain shell-side level in the normal control band. However, the licensee's evaluation determined that these failures were due to design issues associated with the automatic level control system, in large part, due to the age of the installed system. Additionally, the feedwater heater level could not be directly monitored from the control room, but only locally observed in the plant. This resulted in the control room staff being unaware of potential level problems until they resulted in heater isolations.

The licensee has identified numerous actions to improve the overall reliability of the automatic level control system and to improve remote monitoring from the control room. Currently, the licensee was evaluating the necessary actions (including cost) to upgrade the system. The inspectors noted that the Plant Health Committee was tracking these issues as an open item and was reviewing the numerous long term enhancements recommended by the licensee's engineering staff.

The inspectors also noted that operator immediate actions were in accordance with plant procedures, and successfully mitigated the effects of the transients and their effect on the reactor plant.

4OA3 Event Followup (71153)

The inspectors completed one inspection sample in this area.

Licensee Event Report (LER) Review

(Closed) LER 05000456/2005-001-00: Potential TS 3.9.4 Violation Due to Imprecise Original TS and TS Bases Wording.

During the March 2005 Byron Station Unit 1 refueling outage, the NRC identified that the licensee was performing local leak rate testing of containment isolation valves while core fuel alterations were in progress. This was contrary to TS 3.9.4.c., which required that containment penetrations to the outside atmosphere be able to be closed by a manual or automatic isolation valve or by an operable containment isolation system during core alterations. In response to the Byron violation, the licensee immediately removed all local leak rate testing activities planned during core alterations for the upcoming April 2005, Braidwood Unit 1 refueling outage, and initiated CR 340542, to determine whether a similar violation had occurred at Braidwood station in the past. Due to similarities in plant design and plant outage operation, the licensee concluded that it was possible a violation may have occurred and issued the aforementioned LER. The inspectors did not identify any specific instances where the licensee had performed a containment penetration local leak rate testing coincident with core alterations in the past 3 years, including refueling outages 10 and 11 on Unit 1 and outage 10 on Unit 2. However, had such an incident occurred, the consequences would have been of very low safety significance based on the significance assessment performed for the Byron issue. The licensee subsequently established administrative controls to prevent the simultaneous performance of containment penetration local leak rate testing and core alterations. Because the inspectors did not identify any specific instances where the licensee failed to maintain containment integrity during core alterations, no violations of NRC requirements were identified and this LER was considered closed. Those documents reviewed during this inspection are listed in the Attachment.

4OA4 Cross-Cutting Aspects of Findings

.1 A finding described in Section 4OA5.1 of this report had as a primary cause a Problem Identification and Resolution deficiency, in that the licensee failed to identify the cause of blockage in the foam suppression system piping for the Unit 1 and 2 DOST rooms. This failure lead to a recurrence of this blockage in the 2A DOST foam suppression system piping, which rendered it inoperable for a 5-year period.

40A5 Other Activities

.1 (Closed) Unresolved Item 05000456/2005003-01: Blockage in Foam Suppression System of Unit 1 Indoor DOST Rooms.

<u>Introduction</u>: The inspectors identified a finding of very low safety significance (Green) and associated non-cited violation of Braidwood Station Unit 2 Operating License NPF-77, Condition 2.E. This finding was related to the unavailability of the foam-water fire suppression system for the 2A diesel oil storage tank room due to a system blockage.

<u>Description</u>: On June 20, 2005, while evaluating a failed surveillance test for the Unit 1 DOST rooms, the licensee identified that the foam system piping for the 1A and 1B DOST rooms was plugged with dried foam concentrate. At the time of discovery, the inspectors did not have sufficient information regarding the failure to adequately assess the safety significance and regulatory aspects of the issue and therefore documented the issue as an unresolved item in NRC Inspection Report 05000456/2005003. In order to properly review this issue, the inspectors requested the following information from the licensee:

- Did the blockage prevent the water portion of the foam suppression system from operating and was the water portion alone sufficient to mitigate a fire;
- Did the surveillance program for the DOST fire suppression systems meet the National Fire Protection Association code requirements;
- Had the blockage recurred in the Unit 2 DOST suppression piping; and
- What was the suspected cause of the foam piping blockage.

The licensee provided sufficient information to demonstrate that the water portion of the foam suppression system was available, but was insufficient for fire mitigation. Specifically this condition prevented the foam concentrate from mixing with the water portion of the system, and therefore eliminated the capability to inject foam into the rooms.

The licensee demonstrated that the existing surveillance program was acceptable.

The inspectors further noted that the licensee had identified similar clogging of the Unit 2 DOST piping on July 11, 2000. However, while the piping was cleared, no corrective actions were performed to either identify the cause of the blockage, or determine whether the Unit 1 piping was similarly affected until it became self-evident as stated above. Additionally, in December 2004, the inspectors had identified a potential adverse trend regarding the foam protection system for the DOST rooms. The licensee initiated CR 282949 in response to this issue, but again failed to evaluate the cause of the Unit 2 foam system blockage or to determine if the Unit 1 piping was affected.

On July 28, 2005, the licensee performed an inspection of the Unit 2 DOST foam systems and identified that the 2A DOST foam suppression piping was clogged. The clog consisted of dried residue in the piping, likely from overfilling of the foam concentrate storage tanks during system restoration following the July 2000 discovery. The licensee determined that the overfilling was caused by inadequate procedural guidance. Subsequently, the licensee revised the procedures governing the filling of the

foam concentrate tanks, and was evaluating the effectiveness of the preventative maintenance program for the DOST fire protection piping.

The inspectors considered the clogging of the 2A DOST foam suppression piping to be potentially significant, because the DOSTs contained the necessary fuel oil allowing the emergency diesel generators to operate for the minimum 7-day mission time required by the TS. Therefore, a fire in one of the DOST rooms, could potentially affect the availability of its associated emergency diesel generator.

Regarding the Unit 1 DOST foam system blockage, the licensee believed that this condition had likely existed since July 2000 and that the system was considered inoperable since then. Because the inoperability of the Unit 1 DOST foam suppression system was identified through a scheduled surveillance test this issue was considered a licensee identified non-cited violation and the regulatory aspect is discussed in Section 40A7 of this report.

As stated above, the 2A DOST foam system blockage also likely existed since July 2000, and the system was considered inoperable since then. Because the inoperability of the 2A foam suppression system was identified based on the NRC inspector's questions, this issue was considered NRC-identified and the regulatory aspect is discussed below.

<u>Analysis</u>: The failure to identify the cause of the DOST foam suppression piping blockage and to prevent the recurrence of the blockage in the 2A DOST piping, was considered a performance deficiency that warranted a significance evaluation. This issue was considered greater than minor in accordance with Inspection Manual Chapter 0612, Appendix B, dated May 19, 2005, as it affected the protection against external factors (fire) attribute of the Mitigating Systems Reactor Safety Cornerstone. This issue also affected the cross-cutting area of Problem Identification and Resolution, because of the failure to take timely corrective actions.

IMC 0609, Appendix F, "Fire Protection Significance Determination Process," dated February 28, 2005, was used to assess the safety significance of this finding. Per the Phase 1 evaluation, the finding was assigned to the category of "Fixed Fire Protection Systems." Because the foam system was inoperable, this finding was assigned a high degradation rating. Since the condition existed for at least 5 years, the Phase 1 screening indicated that the change in core damage frequency was greater than the screening criteria listed in Table A1.1 of Appendix F, therefore requiring that a Phase 2 evaluation be performed. Since a fire in the DOST rooms would only affect the fire ignition source and the initiating fuels, the item was classified as FDS0 per Step 2.2 of the Phase 2 evaluation. Findings classified as FDS0 are not analyzed in the fire protection SDP as risk contributors and therefore screen to Green. The evaluation results were discussed with a regional fire protection specialist, who agreed with the inspectors' assessment.

<u>Enforcement</u>: Braidwood Station Unit 2 Operating License NPF-77, license Condition 2.E required the licensee to implement and maintain all provisions of the approved fire protection program as described in the FSAR for Braidwood. Section 9.5.1 of the UFSAR for Braidwood stated that the design bases, system descriptions, safety evaluation, inspection and testing requirements, personnel qualification, and training were contained in the Fire Protection Report and incorporated by reference into the UFSAR. Section 2.1.3.2.2(c) of the Fire Protection Manual, dated December 2002, stated that the indoor DOST rooms were protected by a foam suppression system. Contrary to the above, the foam suppression system for the 2A DOST room, remained inoperable for a 5-year period, due to a failure to take timely corrective actions to address system blockage. Because this failure to provide the required fire suppression system was of very low safety significance and has been entered into the licensee's Corrective Actions Program (CR 350973), this violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the NRC Enforcement Policy (NCV 05000457/2005008-01).

- .2 <u>Temporary Instruction 2515/161 Transportation of Reactor Control Rod Drives in</u> <u>Type A Packages</u>
- a. Inspection Scope

The inspectors conducted interviews and record reviews to verify that: (1) the licensee had undergone refueling activities since calender year 2002; and (2) did not ship irradiated control rod drive mechanisms in Department of Transportation Specification 7A, Type A packages during the time frame 2002 to the present.

b. Findings

No findings of significance were identified.

- 40A6 Meetings
- .1 Exit Meeting

The inspectors presented the inspection results to Mr. G. Boerschig and other members of licensee management at the conclusion of the inspection on October 4, 2005. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

.2 Interim Exit Meetings

Interim exit meetings were conducted for:

- Maintenance Effectiveness Periodic Evaluation with Mr. M. Smith, Engineering Director on August 12, 2005.
- Access Control Program and the Radiation Monitoring Instrumentation and Protective Equipment Program Inspection with Mr. K. Polson on August 25, 2005.

- Emergency Preparedness inspection with Mr. D. Ambler on August 12, 2005.
- Biennial Operator Requalification Program Inspection with Mr. R. Gayheart on September 16, 2005.

40A7 Licensee Identified Violations

The following violations of very low significance were identified by the licensee and are considered violations of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as NCVs.

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

Braidwood Station Unit 1 Operating License NPF-72, license Condition 2.E required the licensee to implement and maintain all provisions of the approved fire protection program as described in the UFSAR for Braidwood. Section 9.5.1 of the UFSAR for Braidwood stated that the design bases, system descriptions, safety evaluation, inspection and testing requirements, personnel qualification, and training were contained in the Fire Protection Report and incorporated by reference into the UFSAR. Section 2.1.3.2.2(c) of the Fire Protection Manual, dated December 2002, stated that the indoor DOST rooms were protected by a foam suppression system. Contrary to the above, the foam suppression systems for the 1A and 1B DOST rooms, remained inoperable for a 5-year period, due to system blockage. Because this failure to provide the required fire suppression system is of very low safety significance and has been entered into the licensee's Corrective Actions Program (CR 350973), this violation is being treated as an NCV. This item is discussed in Section 40A5 of this report.

Cornerstones: Emergency Preparedness

Part 50.47 of 10 CFR, Paragraph (b)(15), requires, in part, that radiological emergency response training be provided to those who may be called on to assist in an emergency. Table B-1 of the licensee's standardized emergency plan required that the minimum on-shift staffing included two RP personnel for in-plant protective actions. In September 2004, Emergency Preparedness staff based at another of the licensee's Illinois nuclear stations identified that this emergency plan commitment was met during weekends and holidays by one on-shift Radiation Protection technician and one on-shift chemistry technician. However, the licensee also determined that chemistry technicians' training had evolved such that the training no longer met all requirements to provide in-plant protection actions.

In early December 2004, the licensee completed an adequate root cause investigation of this concern's impact at each of its Illinois nuclear stations. Timely corrective actions included assigning two Radiation Protection technicians on all back shifts, initiating revision of the standardized ERO training procedure, and initiating an assessment of ERO position qualifications in cases where some ERO training was being performed by other departments. Because no actual emergency events had occurred that required in-plant protective actions and the licensee's timely corrective actions included staffing a minimum of two Radiation Protection technicians on-shift, this violation was not more than of very low significance, and was being dispositioned as an NCV.

Cornerstone: Occupational Radiation Safety

Technical Specification 5.7.1 required, in part, that the entrance to a HRA be controlled by issuance of a radiation work permit (RWP) or equivalent document that includes specification of radiation dose rates. RWP 10006103, Revision 0, "Exelon MMD Common Work, Non-Outage, Low Dose Work" contained the requirement that individuals entering an HRA receive a briefing prior to entry. Contrary to this requirement, on July 12, 2005, a mechanical maintenance supervisor entered a posted HRA on the correct RWP but failed to obtain the required briefing for entry into the HRA. This issue was entered in the licensee's corrective action program as IR 00352005. The licensee performed a Prompt Investigation and an Apparent Cause Evaluation for this incident. The issue was determined to be of very low safety significance as the dose consequence (0.2 millirem) was minimal, the individual was on the correct RWP, and did not approach the areas within the HRA where dose rates exceeded 100 mrem per hour.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

- K. Polson, Site Vice President
- G. Boerschig Plant Manager
- K. Aleshire, Emergency Preparedness Manager
- D. Ambler, Regulatory Assurance Manager
- J. Bauer, Licensing Manager
- D. Burton, Licensed Operator Requalification Training Group Lead
- S. Butler, Licensing Engineer
- G. Dudek, Operations Director
- J. Feeney, Nuclear Oversight Manager
- R. Gayheart, Operations Training Manager
- G. Heisterman, Mechanical Maintenance Manager
- J. Kuczynski, Chemistry Manager
- R. Leasure, Radiation Protection Manager
- J. Moser, Radiation Protection Manager
- M. Olson, Simulator Coordinator
- A. Ronstadt, Site Maintenance Rule Coordinator
- J. Ruth, Examination Developer
- M. Sears, Steam Generator Program Manager
- M. Smith, Site Engineering Director
- M. Trusheim, Work Control Manager

Nuclear Regulatory Commission

R. Skokowski, Chief, Reactor Projects Branch 3

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened and Closed		
05000457/2005008-01	NCV	Failure to Provide Required Function to Fire Suppression System in 2A DOST Room
<u>Closed</u>		
05000456/2005-001-00	LER	Potential TS 3.9.4 Violation Due to Imprecise Original TS and TS Bases Wording
05000456/2005003-01	URI	Blockage in Foam Suppression System of Unit 1 Indoor Diesel-Generator Oil Storage Tank Rooms
D . I		

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1R01 Adverse Weather Protection

CR 325132; NOS Identified MSIV Room High Temp Impact on Component Service Life; March 25, 2005

CR 355918; Unit 1 MS Tunnel Security Barrier Screen is Loaded with Dirt; July 22, 2005 CR 356139; Division 11 [Engineered Safety Feature] ESF Switchgear Room Temperature Hi Alarm in Early; July 24, 2005

CR 356186; High Temperature Concerns - MPTS and Division 12 Switchgear Room; July 24, 2005

1R04 Equipment Alignment

BwOP AP E1; Electrical Lineup - Unit 1 Operating Lineup for the 6900V Busses; Revision 2E1

BwOP AP E2; Electrical Lineup - Unit 1 Operating Lineup for the Safety Related 4160V Busses, 480V Switchgear Busses, and 480V MCC's; Revision 3E2

BwOP CC-E1; Electrical Lineup - Unit 1; Revision 6

BwOP CC-M1; Operating Mechanical Lineup Unit 1; Revision 15

BwOP DG-1; DG Alignment to Standby Condition; Revision 25

BwOP DG-E2; Electrical Lineup - Unit 1; Revision 3

BwOP DG-M2; Operating Mechanical Lineup 1B DG; Revision 13

BwOP SX-E1; Electrical Lineup - Unit 1 Essential Service Water system Operating; Revision 6

BwOP SX-E2; Electrical Lineup - Unit 2 Essential Service Water System; Revision 8 BwOP SX-M1; Operating Mechanical Lineup Unit 1; Revision 24

BwOP SX-M2; Operating Mechanical Lineup Unit 2; Revision 24

Protected Equipment Signs for System Auxiliary Transformer 142-1/2 OOS; 1F01PA, 1F01PB, 2AF01PA, 2AF01PB

1R05 Fire Protection

Braidwood-1 Table 3-1; Amendment 13; December 1990 B/B; Amendment 17; December 1996 Braidwood-FPR; Amendment 21; December 2004 BwHS 4009-005; Surveillance of Unit One Fire Detection Zones 1D-24, 39, 67-69 and 75-78; Revision 3E1 CR 291816; Braidwood Review of OES 19826 and 19834 Halon System Issues; January 18, 2005 CR 358997; Cable in Stores System Does Not Meet Fire Protection Requirements; August 2, 2005 CR 361018; Continuing Problems with Installation of Scaffolds Around Safety-Related and Fire Protection Equipment; August 8, 2005 CR 365710; Surface Mounted Emergency Lights/Exit Signs Not Working; August 23, 2005 CR 366700; Wooden Spacers on Battery Racks; August 25, 2005 CR 366708; Wood is Not Fire Resistant on Battery Racks; August 25, 2005 CR 368744; Questions with New Style Betalux Exit Signs and Safety; August 31, 2005 CC-AA-501; Exelon Nuclear Welding Program; Revision 0 Field Change Request L-23678: Provide Sealing Details for Penetrations 2AV-601, 602. 1086 and 1087; October 15, 1986 Drawing 2AB-1086; Proposed Seal for 2AB-1086; Sheets Number 1 and 2; September 29, 1997 Drawing TM-1; High Density Silicone Elastomer Radiation Seal for Stationary Mechanical Penetrating Members; June 29, 1984 Drawing TM9; Flood/Air Boot and Ceramic Blanket Fire Barrier for Single Stationary or Moving Penetrating embers; June 18, 1984 Drawing 20E-0-3907; Fire Detection, Main Floor at Elevation 451'-0" Braidwood Station Unit 1&2 Commonwealth Edison Co. Chicago, Illinois; Revision R Figure 2.3-8; Byron/Braidwood Station Fire Protection Report, Main Floor at Elevation 451'-0"; Sheet 2 of 4 Fire Protection Report; Division 12 Miscellaneous Electrical Equipment and Battery Room (Fire Area 5.4-1); Amendment 18 SA-AA-129-2118; Management and Control of Temporary Power; Revision 2 TR-127; Hydrostatic Test of a TCO-015 Fabric Boot Seal Installed on a 40" Diameter Steel Sleeve Penetrated by a 30" Diameter Pipe; Revision 1; January 23, 1984

TR-148; Fire and Hose Stream Test of TCO-003 High Density Silicone Elastomer for Mechanical Penetrations; March 14, 1985

TR-185; Fire and Hose Stream Test of 8" Thick Specimen of TCO-010 Ceramic Blanked Used as a Penetration Seal Material in a 12" Diameter Sleeve Penetrated by Bare Pipe, Insulated Pipe, and Copper, Monel, and Stainless Steel Instrument Tubing; Revision 0; March 13, 1985

TR-198; Fire and Host Stream Test of TCO-010 Ceramic Blank Single Wrap, TCO-010 Ceramic Blanket Spiral Wrap, and TCO-029 Pre-Fab Aluminized Boot Seals for Mechanical Penetrations; March 19, 1985

1R06 Flood Protection Measures

BwAP 1110-3; Plant Barrier Impairment Program; Revision 13 0BwOA; Auxiliary Building Flooding Unit 0; Revision 2 Calc. No. 3CB-0685-002; January 15, 1993; Revision 13 CC-AA-201; Plant Barrier Control Program; Revision 6 CR 359405; Flood Watch Performed Too Early; August 3, 2005

1R07 Heat Sink Performance

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