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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137-5927

MAY 20 1993

Docket No. 50-457
License No. NPF-77
EA 93-063

Commonwealth Edison Company
ATTN: Mr. L. O. DelGeorge, Vice President
Nuclear Oversight
and Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 300
Downers Grove, Illinois 60515

Dear Mr. DelGeorge:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL
PENALTY - \$50,000
(INSPECTION REPORT NO. 50-457/93006)

This refers to the routine safety inspection conducted on March 18, 1993, at the Braidwood Generating Station to review the circumstances under which the Unit 2 reactor vessel head vent system was rendered inoperable. The report documenting this inspection was mailed to you by letter dated April 2, 1993. A significant violation of NRC requirements was identified during the inspection, and on April 16, 1993, an enforcement conference was held in the Region III office. A copy of the enforcement conference report was mailed to you on April 23, 1993.

To summarize the events, on March 11, 1993, Unit 2 was in a refueling outage (Mode 5) when plant personnel while performing reactor coolant system (RCS) draining evolution discovered that the manual reactor vessel head vent isolation valve (2RC8070) was in the closed and locked position. This valve is common to both reactor vessel head vent paths and is required to be in the open and locked position during reactor operations in Modes 1-4. The closure of the valve caused both reactor vessel head vent paths to be inoperable. Your review of the event indicated that the valve was locked shut on or about November 15, 1991. The unit was changed to Mode 4 on November 17, 1991, and continued to operate until March 6, 1993, when the unit was changed to Mode 5 for refueling.

The root causes of the violation and the subsequent corrective actions were discussed during the April 16, 1993, enforcement

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conference. The major factors contributing to the violations appeared to be: 1) the reactor head vent path locked valve 18 month surveillance and the RCS venting activities were not sequenced to allow for verification of proper configuration before entering Mode 4; 2) the reactor vessel fill and vent, and the safety injection system check valve stroke test procedures did not describe the operation of 2RC8070 and although the valve was commonly used in those procedures, its use was not proceduralized; and 3) the abnormal position log was not used to track the position of 2RC8070.

The NRC recognizes that immediate corrective actions were taken to restore system operability when the violation was identified. Additionally, the NRC notes the numerous longer term actions that have been undertaken including various procedural changes, surveys of the locked valve control procedures of other licensees, and a number of training initiatives.

The violation, described in the enclosed Notice of Violation, concerns the failure to place the operating unit in hot standby within six hours and in cold shutdown within the following 30 hours when the inoperable reactor vessel head vent path was not repaired within 30 days. The violation represents a significant failure to comply with the Action Statement for a Technical Specification Limiting Condition for Operation where the appropriate action was not taken within the required time. Therefore, in accordance with the "Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy) 10 CFR Part 2, Appendix C, this violation has been categorized at Severity Level III. Because the closed valve rendered both trains of the reactor vessel head vent system inoperable, classification of this violation at Severity Level II was considered. However, given that a number of alternate methods were available to remove voids in the reactor vessel head, had that been necessary, such a classification was determined not to be appropriate.

To emphasize the importance of maintaining proper control of the valve alignment of important plant systems, especially for valves that could render multiple flow paths inoperable, I have decided, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Nuclear Reactor Regulation, Regional Operations, and Research, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) in the amount of \$50,000 for the violation set forth in the Notice.

The base value of a civil penalty for a Severity Level III violation is \$50,000. After considering the civil penalty adjustment factors set forth in the NRC Enforcement Policy no adjustment of the civil penalty was found to be appropriate. This determination was made after applying mitigation for your

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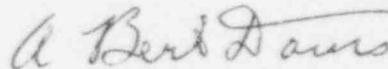
identification of the root cause of this self-disclosing event and your corrective actions as well as escalation for the amount of time the system was inoperable.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room.

The response directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96-511.

Sincerely,



A. Bert Davis
Regional Administrator

Enclosure:
Notice of Violation and Proposed
Imposition of Civil Penalty

cc w/encl:
S. Berg, Site Vice President
K. Kofron, Station Manager
A. Haeger, Regulatory
Assurance Supervisor
D. Farrar, Nuclear Regulatory
Services Manager
Resident Inspectors, Byron,
Braidwood & Zion
D. W. Cassel, Jr., Esq.

cc w/encl: See Next Page

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cc w/encl: (Con't)
Richard Hubbard
J. McCaffrey, Chief, Public
Utilities Division
Licensing Project Manager, NRR
R. Newmann, Office of Public Counsel
State Liaison Officer
Chairman, Illinois Commerce Commission

Commonwealth Edison Company

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