Commonwealth Edison
Braidwood Nuclear Power Station
Route #1, Box 84
Braceville, Illinois 60407
Telephone 815/458-2801

April 6, 1994
SVP/94-021

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-456/94003; 457/94003
NRC Docket Numbers 50-456 and 50-457

References: 1) C. D. Pederson letter to S. Berg dated March 10, 1994 transmitting NRC Inspection Report 50-456/94003; 50-457/94003

2) C. D. Pederson letter to L. DelGeorge dated March 30, 1993 transmitting NRC Inspection Report 50-456/93005; 50-457/93005

Enclosed is Commonwealth Edison Company's (CECo) response to the Notice of Violation (NOV) which was transmitted with the letter and Inspection Report identified in reference 1. The NOV cited a Severity Level IV violation requiring a written response. CECo's response is provided in the attachment.

If your staff has any questions or comments concerning this letter, please refer them to Kevin Bartes, Braidwood Regulatory Assurance Supervisor, at (815)458-2801, extension 2980.

Sincerely,

for Sigval M. Berg Jr.
Site Vice President
Braidwood Station

SMB/JML/mr

Attachments

cc: J. B. Martin, NRC Regional Administrator - RIII
R. R. Assa, Project Manager - NRR
S. G. Du Pont, Senior Resident Inspector

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 50-456/94003; 50-457/94003

VIOLATION (456(457)/94003-01):

Technical Specification 6.8.1.a requires that procedures recommended in Regulatory Guide 1.33, Revision 2, be established, implemented, and maintained.

Regulatory Guide 1.33, Section 8.a, in part, recommends procedures to ensure that instruments and measuring equipment, such as laboratory equipment, are properly calibrated and adjusted at specified periods to maintain accuracy.

Procedure BwCP PD-7, "Braidwood Station Chemistry Quality Control Program," requires compliance with the requirements of NOD-CY.8, "Nuclear Stations Division Chemistry Quality Control Manual," which requires that station inline quality control practices be performed in accordance with the Nuclear Operations Inline Chemistry Quality Control Program Manual (Manual) to ensure the reasonable accuracy of all chemical and radiological measurements.

Definition 8.2, "Acceptance Criteria," of the Manual defines the limits "associated with a performance check that determine if corrective action shall be taken."

Contrary to the above, as of about April 1993, corrective action for performance check results outside of the acceptance criteria on the inline chemistry instruments had not been performed as required.

REASON FOR THE VIOLATION:

When Braidwood Chemistry personnel took action in response to the Notice of Violation (NOV) cited in reference 2, they addressed the mechanics of the program but did not meet the intent of maintaining quality control. Chemistry personnel lost focus of the importance of assuring the validity of the information being obtained from the inline instrumentation. A lack of ownership in the department contributed to this problem.

In December 1993, a review of the Inline Quality Control Program was performed. Although it was viewed that commitments made in response to the NOV in reference 2 were being met, several programmatic weaknesses were observed. While performance checks were being done, procedures describing how to do the performance

checks were inadequate. Instrument failures were not being addressed. The responsibility for accomplishing the checks was given to an off-site CECo management employee. These problems were confirmed prior to the inspection by Site Quality Verification. Corrective actions for these problems had not been completed because Chemistry Management was still in the process of identifying and understanding the extent of the Inline Quality Control programmatic weaknesses.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Braidwood Chemistry personnel began taking grab samples and performing laboratory analysis of these samples in lieu of relying on inline instrument data on February 4, 1994, in accordance with BwCP PD-4, "Braidwood Station Secondary Water Chemistry Surveillance Program."

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

The Chemistry Supervisor discussed this violation with Chemistry Department personnel emphasizing the importance of ownership and teamwork. As a result, a Chemistry Department team has been assembled to restore the Chemistry Inline Quality Control Program. The team will ensure that all Program procedural requirements are met.

The Secondary Chemistry Program will be reviewed to verify implementing procedures satisfy the applicable requirements. Chemistry Management personnel and Chemistry Technicians will jointly develop and field test the Program procedures to ensure technical accuracy.

An agreement between the Chemistry and Instrument Maintenance Departments will ensure support for timely troubleshooting and repair of inline instruments.

Chemistry will resume using inline instruments for data collection on a case by case basis only after they are satisfied that an instrument is functioning properly and that the related required procedures are in place. Actions associated with restoring the Chemistry Inline Quality Control Program will be complete by June 30, 1994.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on February 4, 1994, with the implementation of grab samples and laboratory analysis as required by BwCP PD-4.