

FEB 22 1994

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Docket Nos. 50-456; 50-457
License Nos. NPF-72/77
NOED No. 94-3-004

Commonwealth Edison Company
ATTN: Mr. S. Berg
Site Vice President
Braidwood Station
RR #1, Box 84
Braceville, IL 60407

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR COMMONWEALTH EDISON COMPANY
REGARDING BRAIDWOOD STATION UNITS 1 AND 2

Dear Mr. Berg:

By letter dated February 19, 1994, you requested the U.S. Nuclear Regulatory Commission (NRC) to exercise its discretion not to enforce compliance with the allowed outage time of Technical Specification 3.0.3. Technical Specification 3.0.3 was in effect because the limiting condition of Technical Specification 3.7.6 could not be met in that Technical Specification 3.7.6 provides that only a single train of control room ventilation may be inoperable at any one time. You declared both trains of control room ventilation inoperable at 2:05 p.m. on February 18, 1994, after determining that backup batteries supplying certain dampers in Trains A and B of main control room ventilation did not have minimum acceptable voltage.

You informed the NRC on February 18, 1994, at approximately 3:00 p.m. that Braidwood Station could not repair or replace the deficient batteries and could not otherwise provide positive damper positioning within the time limits specified in Technical Specification 3.0.3. You requested exercise of enforcement discretion for an extension of 72 hours of the specified one-hour allowed outage time. The extension was to allow time to restore one train of the control room ventilation system to an operable status by providing positive positioning on the affected dampers. Details of the situation were discussed among staff of this office, the Office of Nuclear Reactor Regulation, members of your staff and you in a telephone conference call following your notification. You provided justification for continued operation based on:

1. Declaring the ventilation trains inoperable was solely based on deficient voltage in backup batteries, which would only be called upon to function in case of an event requiring emergency ventilation, in combination with failure of both normal and emergency electrical power. This is a low probability series of events.
2. Highly conservative assumptions were made about the performance of unaffected dampers, the magnitude of potential radiological sources, and toxic gas release probabilities. Realistic analyses yield reduced consequences.

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- 3. Practical compensatory measures were available and were applied to minimize failure probability of any components needed for control room ventilation and to provide supplementary protection if needed.

On the basis of our evaluation of your justification, including compensatory measures discussed with your staff and subsequently documented in your letter, the NRC staff has concluded that this exercise of enforcement discretion is warranted from the perspective of public health and safety.

Based on the above, this documents our verbal notification on February 18, 1994, at 4:00 p.m., of our intention to exercise discretion not to enforce compliance to the allowed outage time of Technical Specification 3.0.3 for the period from February 18, 1994, at 3:05 p.m. (CST), when the original allowed outage time would have expired, until February 21, 1994, at 3:05 p.m. (CST). However, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,
Original Signed by
E. G. Greenman
 for Edward G. Greenman, Director
 Division of Reactor Projects

- cc:
- L. DelGeorge, Vice President, Nuclear Oversight & Regulatory Services
 - K. Kofron, Station Manager
 - A. Haeger, Regulatory Assurance Supervisor
 - D. Farrar, Nuclear Regulatory Services Manager
 - OC/LFDCB
 - Resident Inspectors, Braidwood, Byron, Zion
 - H. A. Learner
 - R. Hubbard
 - J. W. McCaffrey, Chief, Public Utilities Division
 - Licensing Project Manager, NRR
 - R. Newmann, Office of Public Counsel
 - State Liaison Officer
 - Chairman, Illinois Commerce Commission
 - L. A. Reyes, Acting ADPR/NRR
 - W. T. Russell, ADT/NRR
 - J. W. Roe, DRPW/NRR
 - J. A. Zwolinski, ADR3/NRR
 - J. Lieberman, OE
 - Technical Assistant, Division of Reactor Projects - I/II, NRR

bcc: PUBLIC (IE01)

<i>YES</i>	<i>RIII</i>	<i>RIII</i>	<i>RIII</i>	<i>RIII</i>	<i>NRR</i>	<i>RIII</i>
	<i>Jorgensen</i>	<i>Sor Clayton</i>	<i>Hausman</i>	<i>DeFayette</i>	<i>J. Dyer</i>	<i>GM for Greenman</i>
	<i>2/25/94</i>	<i>2-22-94</i>	<i>mm</i>	<i>2/22/94</i>	<i>Zwolinski</i>	<i>2/22</i>
					<i>Telecom</i>	
					<i>2/22</i>	