



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

December 1, 1994

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2  
Supplemental Response to Notice of Violation  
Inspection Report Nos. 50-456/94021; 457/94021  
NRC Docket Numbers 50-456 and 50-457

- References:
- 1) K. Kaup letter to L. F. Miller dated November 1, 1994, transmitting the Reply to a Notice of Violation, NRC Inspection Report 50-456/94021; 50-457/94021
  - 2) L. F. Miller letter to K. Kaup dated October 6, 1994, transmitting NRC Inspection Report 50-456/94021; 50-457/94021

Reference 1 provided Commonwealth Edison Company's (ComEd) reply to the Notice of Violation (NOV) which was transmitted with the letter and Inspection Report identified in reference 2. The NOV cited a Severity Level IV violation requiring a written response. Reference 1 addressed examples 2, 3, 4, and 6 of the violation.

In accordance with the telephone conversation on October 31, 1994, between Sara Reece-Koenig, Corporate Regulatory Services, and Nicholas Hilton, RC Region III, ComEd was granted a 30 day extension for responding to examples 1 and 5 of the violation to allow a thorough root cause investigation of the issues. ComEd's reply to examples 1 and 5 is provided in the attachment.

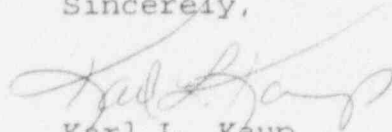
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If your staff has any questions or comments concerning this letter, please refer them to Kevin Bartes, Braidwood Regulatory Assurance Supervisor, at (815)458-2801, extension 2980.

Sincerely,



Karl L. Kaup  
Site Vice President  
Braidwood Station

KLK/JML/mr

Attachment

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

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION  
INSPECTION REPORT 50-456/94021; 50-457/94021

VIOLATION (456(457)/94021-01):

Technical Specification 6.8.1 required that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A, Regulatory Guide 1.33. Revision 2, February 1978, which includes preparations for refueling, procedure adherence, and radiation protection. Seven examples contrary to the above follow:

1. BwFP FH-31, "Fuel Handling Cleanliness Zones and Requirements," required personnel accountability be accomplished in a cleanliness zone II area by logging each individual in and out of the control point using the ingress, egress and equipment accountability form (BwFP FH-31T1).

Contrary to the above, on August 10, 1994, the licensee failed to log individuals in and out of a cleanliness zone II area control point using FH-31T1.

2. BwFP FH-31 required that a cleanliness zone II area be posted with a large, conspicuously placed sign having general instructions for entry.

Contrary to the above, on August 10, 1994, the licensee failed to post a cleanliness zone II area with an appropriate sign referencing the appropriate procedure with general instructions for entry.

3. BwFP FH-31 required that an entrance to a cleanliness zone II area include applicable procedure and logs in the area as required.

Contrary to the above, on August 10, 1994, the licensee failed to have the applicable procedure and logs in the area as required.

4. BwAP 100-20, "Procedure Use and Adherence," required that when an individual perceives that a procedure cannot be performed as written, that the individual inform supervision of the situation for evaluation. The supervisor will then evaluate the situation and determine the appropriate course of action.

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REPLY TO A NOTICE OF VIOLATION (CONTINUED)  
INSPECTION REPORT 50-456/94021; 50-457/94021

Contrary to the above, on August 4, 1994, while securing the 2C condensate/condensate booster pump, nuclear station operators perceived that the governing procedure could not be performed as written, but nevertheless performed equipment manipulations outside the procedure without directly informing supervision and receiving guidance as required.

5. BWRP 5000-7, "Unescorted Access To and Conduct in Radiologically Posted Areas," required that personnel entering a radiologically posted area read and understand all radiological signs which appear at the access control point, and ensure that he or she has been issued a routine thermoluminescent detector (TLD) badge and at least one secondary dosimeter.

Contrary to the above, on August 30, 1994, two licensee employees who entered the radiologically protected area (RPA) failed to read and understand the radiological signs which appeared at the RPA control point, and failed to obtain secondary dosimetry as required.

6. BWAP 575-5, "Release of Material from a Radiologically Posted Area," required that "solid material shall not be given an unconditional release (from the Radiation Protection Area) until the material has been decontaminated and determined to be free of detectable radioactive material".

Contrary to the above, on August 18, 1994, the licensee discovered an eddy current cover plate with 10,000 dpm/100 cm<sup>2</sup> smearable contamination on one bolt hole opening and 18,000 dpm/100 cm<sup>2</sup> smearable contamination on another bolt hole opening released outside the Radiation Protection Area without being decontaminated and free of detectable radioactive material.

Also contrary to the above, on August 30, 1994, the licensee discovered a reactor cavity decontamination paint container and a chair with 2,000 dpm/100 cm<sup>2</sup> smearable contamination released outside the Radiation Protection Area without being decontaminated and free of detectable radioactive material.

This is a Severity Level IV violation.

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REPLY TO A NOTICE OF VIOLATION (CONTINUED)  
INSPECTION REPORT 50-456/94021; 50-457/94021

REASON FOR THE VIOLATION (EXAMPLE 1):

BwFP FH-31, "Fuel Handling Cleanliness Zones and Requirements," was written by the Fuel Handling Department to clarify the cleanliness requirements for the reactor cavity, spent fuel pool, and new fuel storage area which are listed in BwAP 1100-18, "Station Housekeeping/Material Condition Program." The procedure included the ingress, egress and equipment accountability form BwFP FH-31T1.

BwFP FH-31 was approved on January 1, 1994. However, once the procedure was approved, the Fuel Handling Department failed to comply with the requirements for logging in and out of the control point due to inattention to detail and a failure of Fuel Handling management to review and reinforce expectations with the workers.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED  
(EXAMPLE 1):

A copy of BwFP FH-31 and the personnel accountability log, BwFP FH-31T1, were immediately placed at the control point for the cleanliness zone II area in the new fuel storage area.

Fuel Handling management directed department personnel to meet the requirements of BwFP FH-31 by logging in and out of the control point utilizing the accountability log.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION  
(EXAMPLE 1):

The importance of material and personnel accountability has been stressed at camp meetings with Fuel Handling management and bargaining unit personnel.

A surveillance activity has been established for the Fuel Handling Department to review procedure BwFP FH-31 prior to each refuel outage.

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REPLY TO A NOTICE OF VIOLATION (CONTINUED)  
INSPECTION REPORT 50-456/94021; 50-457/94021

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION  
(EXAMPLE 1 CONTINUED):

The wording on the posting for cleanliness zone II areas will be enhanced to alert all site personnel entering the areas to meet the requirements of BwFP FH-31 by logging in and out of the control point utilizing the accountability log. This action will be complete prior to the next refueling outage which is scheduled to begin for Unit 1 on September 30, 1995.

Additionally, the Station will perform an evaluation of BwFP FH-31, BwAP 1100-18, and BwAP 100-21, "Foreign Material Exclusion," for potential enhancements to ensure consistency in the use and requirements of the procedures. The review will be performed and the procedures will be revised if appropriate prior to the next refueling outage which is scheduled to begin for Unit 1 on September 30, 1995.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED  
(EXAMPLE 1):

Full compliance was achieved on August 13, 1994.

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REPLY TO A NOTICE OF VIOLATION (CONTINUED)  
INSPECTION REPORT 50-456/94021; 50-457/94021

REASON FOR THE VIOLATION (EXAMPLE 5):

The electrical maintenance individuals did not self check prior to entering the RPA and as a result, failed to adhere to BWRP 5000-7, "Unescorted Access To and Conduct in Radiologically Posted Areas."

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED (EXAMPLE 5):

The individuals proceeded to the auxiliary building control point where they discussed their lack of dosimetry in the RPA with a Radiation Protection (RP) technician. The individuals then exited the RPA after frisking. The RP technician documented the violation on a Problem Identification Form.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION (EXAMPLE 5):

The individuals involved in the violation were counselled by the Electrical Maintenance Department Supervisor regarding the importance of adhering to procedures and self checking.

Letters of reprimand were placed in the individuals' personnel files.

The Electrical Maintenance Supervisor reinforced the expectations regarding radiation worker practices with the department.

A General Information Notification (GIN) was issued to site personnel on November 28, 1994. The GIN discussed radiological work practices and reinforced the requirements for adhering to radiological postings and procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (EXAMPLE 5):

Full compliance was achieved on August 30, 1994.