



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

December 9, 1994

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

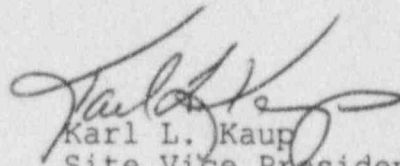
Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2  
Reply to a Notice of Violation  
Inspection Report Nos.  
50-456/94022; 50-457/94022  
NRC Docket Numbers 50-456 and 50-457

References: 1) E. G. Greenman letter to K. Kaup dated  
November 14, 1994, transmitting  
NRC Inspection Report  
50-456/94022; 50-457/94022

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

  
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

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION  
INSPECTION REPORT  
50-456/94022; 50-457/94022

VIOLATION (456(457)/94022-01):

Technical Specification 6.8.1 requires 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.

- a. Contrary to the above, on October 1, 1994, the licensee failed to properly implement BwFP FH-3, "New Fuel Transfer To/From Storage Vault," during new fuel movements from the new fuel vault to the spent fuel pool. This resulted in the mispositioning of 19 fuel assemblies.
- b. Contrary to the above, on October 21, 1991, the licensee failed to properly maintain and implement BwFP FH-14, "Operation of Refueling Machine," during fuel movements from the spent fuel pool to the reactor vessel.

This is a Severity Level IV violation.

REASON FOR THE VIOLATION (456(457)/94022-01a):

The reason for this violation is that the fuel handling crew applied less than adequate attention to detail while removing the new fuel assemblies from the new fuel storage vault (NFSV). They also failed to self check that NFSV location F5 had been emptied prior to moving to cell location E6 which resulted in the mispositioning of the 19 new assemblies.

Contributing to this violation was the use of plastic bags to cover individual fuel assembly cells for foreign material exclusion. Placement of the bags prevented the fuel handlers from verifying the presence or absence of new fuel assemblies in the cells.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED (456(457)/94022-01a):

The Fuel Handling Supervisor realized that a problem existed and suspended new fuel assembly moves until the cause of the problem was identified and amended nuclear component transfer lists (NCTL) were written to rearrange the fuel as appropriate.

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REPLY TO A NOTICE OF VIOLATION  
INSPECTION REPORT  
50-456/94022; 50-457/94022

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION  
(456(457)/94022-01a):

A Braidwood Event Review Presentation was held on Monday October 3, 1994, with all the fuel handling personnel available on shift, to discuss the event, identify further problems, and determine corrective actions. No additional problems were identified.

As a method of ensuring that self checking occurs and the correct fuel assembly is moved, a temporary procedure change was written for BwFP FH-3, "New Fuel Transfer To/From Storage Vault." This procedure change requires a triple verification before a new fuel assembly can be removed from the NFSV. This procedure will be permanently revised prior to the next refueling outage which is currently scheduled to begin for Unit 1 on September 30, 1995.

The Fuel Handling department has revised their policy for using plastic bags to cover individual fuel assembly cells. The plastic bags will be temporarily removed from the cells in an NFSV until all fuel assemblies from that particular NFSV have been removed. At that time, the plastic bags will be replaced on the cells to maintain foreign material exclusion.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (456(457)/94022-01a):

Full compliance was achieved on October 3, 1994.

REASON FOR THE VIOLATION (456(457)/94022-01b):

The reason for this violation is that fuel handling personnel relied on their past experience, training, and familiarity with BwFP FH-14 to enable them to execute the procedure. As a result, the procedure was not properly followed or adequately implemented as described in the Inspection Report.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED (456(457)/94022-01b):

To address the identified procedure adherence concerns, Fuel Handling management stopped the activities in progress and discussed the safety significance of the actions taken prior to resuming the activities.



ATTACHMENT

REPLY TO A NOTICE OF VIOLATION (CONTINUED)  
INSPECTION REPORT  
50-456/94022; 50-457/94022

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED (456(457)/94022-01b  
CONTINUED):

To address the concerns associated with not adequately implementing BwFP FH-14 for insertion and removal of fuel in the core, the fuel handlers stopped the activities upon being questioned by the NRC Resident Inspector. An evaluation was performed which determined that the weight figures were excessively high, due to a previous calibration error in the weight indicator. Subsequently, core alterations were resumed.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION  
(456(457)/94022-01b):

Procedure BwFP FH-14 will be evaluated for changes and revised as appropriate. Additionally, the fuel handlers will be trained on the revised procedure. These actions will be completed prior to the next refueling outage which is currently scheduled to begin for Unit 1 on September 30, 1995.

Regarding the refueling machine labeling discrepancies identified in the Inspection Report, an evaluation will be performed to identify any labeling changes that need to be made. This action will be completed prior to core offload during the next refueling outages which are currently scheduled to begin for Unit 1 on September 30, 1995, and for Unit 2 on March 2, 1996.

The Fuel Handling department will review all fuel handling procedures for consistency with actual practices. These actions will be completed prior to the next refueling outage which is currently scheduled to begin for Unit 1 on September 30, 1995.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (456(457)/94022-01b):

Full compliance was achieved on October 21, 1994.

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION (CONTINUED)  
INSPECTION REPORT  
50-456/94022; 50-457/94022

VIOLATION (457/94022-02):

Technical Specification 3.9.5 requires that during core alterations, direct communications shall be maintained between the control room and personnel at the containment refueling station.

Contrary to the above, on October 15, 1994, during transfer of the reactor vessel upper internals from the reactor vessel to the upper internals storage location, a core alteration, direct communications was not maintained as required.

This is a Severity Level IV violation.

REASON FOR THE VIOLATION (457/94022-02):

The reason for this violation is that a personnel error was made on the part of the Fuel Handling Supervisor (FHS) in that he did not maintain the communications link with the control room. The FHS positioned himself approximately 35 feet from the speaker phone to observe remote television monitors to determine if a bundle or a control rod was inadvertently lifted. Also, he was able to hear the source range count in the containment while ensuring his dose would be as low as reasonably achievable. He incorrectly believed he could hear the speaker phone from this location.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED (457/94022-02):

The Unit NSO contacted personnel in the Fuel Handling Building who alerted the FHS to call the control room. Voice communications were then re-established.

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50-456/94022; 50-457/94022

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION  
(457/94022-02):

The Senior License Holder spoke to the individual regarding proper communication techniques to be implemented while acting as the Fuel Handling Supervisor.

A telephone handset with a long cord has been identified as the proper method of communications during core alterations. This method has since been used successfully for the replacement of the upper internals as well as for the placement of the reactor vessel head.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (457/94022-02):

Full compliance was achieved on October 15, 1994.