



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

March 6, 1992

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2  
Response to Notice of Violation  
Inspection Report Nos. 50-456/92002; 50-457/92002  
NRC Docket Numbers 50-456 and 50-457

Reference: L. Greger letter to C. Reed dated February 7, 1992  
transmitting NRC Inspection Report  
50-456/92002; 50-457/92002

Enclosed is Commonwealth Edison Company's (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. The NOV cited two Severity Level IV violations requiring a written response. The violations concerned the failure to revise GSEP lesson plans within the required timeframe, and the failure to provide training in emergency response to repair and damage control teams. CECo's response is provided in the attachment. If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 515-7285.

Very truly yours,

*P. L. Barner* for

T.J. Kovach  
Nuclear Licensing Manager

Attachment

cc: A. Bert Davis, NRC Regional Administrator - Rill  
R. Pulsifer, Project Manager - NRR  
S. Dupont, Braidwood Senior Resident Inspector

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## ATTACHMENT

### RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 50-456/92002; 457/92002

#### VIOLATION (456/92002-01)

10 CFR Part 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 10 CFR Part 50.47(b) and the requirements of Appendix E of 10 CFR Part 50. Appendix E states that the emergency plan will provide a description of the specialized training which emergency response personnel assigned to repair and damage control teams will receive. The GSEP, Section 8.2.1, states that emergency response personnel assigned to repair and damage control teams will perform emergency response activities as an extension of their normal duties and will be trained each year as part of their duty specific training.

Contrary to the above, emergency response personnel assigned to repair and damage control teams did not receive specialized emergency preparedness training, relevant to their role in the emergency response organization, each year as part of their duty specific training.

#### REASON FOR THE VIOLATION

Emergency plan training was given in three separate and distinct groupings. 1) All persons with unescorted access to the protected area received training on their required actions in the event of an emergency. This was provided during Nuclear Station General Employee Training (N-GET). 2) All CECO station employees, including repair and damage control teams, received training on the following topics annually in addition to N-GET: the purpose and scope of the emergency plan, the purpose of event classification, types of classifications, emergency facilities, the purpose of protective action recommendations for the off-site public, protective measures for the onsite worker, and the reasons for exercises and drills. 3) Those persons with specific Technical Support Center, Operational Support Center, or Control Room responsibilities during an emergency, received annual job specific training.

Commonwealth Edison acknowledges that the repair and damage control teams did not receive training on the specific objectives issued by Nuclear Services Emergency Preparedness (NSEP) in October 1991. The Emergency Preparedness trainer did not update the lesson plans with these specific objectives; therefore the NSEP guidance documents were not fully implemented.

#### CORRECTIVE STEPS TAKEN AND RESULTS RECEIVED

The Emergency Preparedness trainer involved has been reassigned. The new trainer is aware of the requirement to update lessons plans to reflect changes in the NSEP guidance documents.

A review of all GSEP training lesson plans is in progress. This review will identify those lesson plan changes that must be made to reflect the objectives contained in the NSEP guidance documents. The lesson plan review is expected to be completed by March 20, 1992. Those lesson plans requiring changes will be revised by April 30, 1992.

The annual training conducted for all CECs station employees has been revised to incorporate the objectives of module S-1 as described in the NSEP guidance document.

The annual training conducted for repair and damage control teams has been revised to incorporate the objectives of module S-3 as described in the NSEP guidance document. Training on these new objectives is expected to be completed by August 31, 1992.

#### CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

Future changes to GSEP training requirements will be tracked to completion using the training department change tracking system. This will ensure that the requirement will be met.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The repair and damage control team annual training has been revised. Full compliance will be achieved with the completion of the training for those teams, which is expected to be completed by August 31, 1992.

## VIOLATION (456/92002-02)

10 CFR Part 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 10 CFR Part 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. The Generating Station Emergency Plan (GSEP), Section 8.5.7, states that Emergency Plan Implementing Procedures and corresponding lesson plans shall be developed consistent with the GSEP within 4 months of any GSEP revision.

Contrary to the above, lesson plans corresponding to the GSEP were not revised within four months of the revision of the GSEP. The GSEP was revised in March 1991, and as of January 1992, relevant lesson plans had not been revised to be consistent with the current GSEP revision.

## REASON FOR THE VIOLATION

Some of the GSEP lesson plans were revised prior to the issuance of revision 7 of the GSEP manual to include the additional requirements to be imposed by revision 7. After revision 7 was issued, certain requirements of revision 6 were no longer appropriate. The lesson plans were not updated to delete these requirements. Required changes to the training programs were not effectively tracked to completion.

Station procedures were promptly revised to reflect revision 7 of the GSEP manual. The actual training was conducted using the most current revisions of the station procedures.

## CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A review of training lesson plans is in progress. This review will identify lesson plan changes that must be made to reflect the most current revision of the GSEP manual. The lesson plan review is expected to be completed by March 20, 1992. Lesson plans requiring changes are expected to be revised by April 30, 1992.

## CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

Upon issuance of revisions to the GSEP manual, Nuclear Services Emergency Preparedness (NSEP) issues a letter highlighting that the changes made may require revisions to station procedures and lesson plans within four months in accordance with GSEP Section 8.5. NSEP will continue to request that each Station review the GSEP revision and appropriately revise their station procedures and lesson plans to incorporate necessary changes.

Braidwood Station will begin tracking the review and updating of lesson plans via the training department change tracking system to ensure the revision process is tracked to completion.

## DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved with completion of the revised training lesson plans which is expected to be completed by April 30, 1992.