

August 29, 1995

EA 95-174

Mr. K. Kaup
Site Vice President
Braidwood Station
Commonwealth Edison Company
R.R. #1, Box 84
Braceville, IL 60407

SUBJECT: NRC INSPECTION REPORTS NO. 50-456/95011(DRS); NO. 50-457/95011(DRS)

Dear Mr. Kaup:

This refers to the inspection conducted by Mr. E. Cobey of this office on July 17 through August 21, 1995. The inspection included a review of activities authorized for your Braidwood facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report (Enclosure 1).

Areas examined during the inspection are identified in the report. The inspectors reviewed the circumstances surrounding the installation of an unauthorized temporary alteration of the 211 battery area exhaust ventilation system. Within these areas, the inspection consisted of selective examinations of procedures and representative records and interviews with personnel. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and according to NRC requirements.

Based on the results of this inspection, four apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600 (60 FR 34381, June 30, 1995). The apparent violations involve: 1) failure to perform an operability assessment for the 125-Volt D.C. bus, fed from battery 211, when the battery exhaust ventilation system, a safety related support system, was inoperable; 2) failure to provide an adequate annunciator response procedure which would have ensured that the hydrogen concentration in the battery area would not have exceeded the design limit for hydrogen; 3) failure to follow an annunciator response procedure; and 4) failure to perform a safety evaluation to demonstrate that a change to the facility would not have resulted in an unreviewed safety question. No Notice of Violation is presently being issued for these inspection findings. Please be advised that the number and characterization of the apparent violations described in the enclosed inspection report may change as a result of further NRC review.

9509050208 950829
PDR ADOCK 05000456
G PDR

050001

JED

A pre-decisional enforcement conference to discuss these apparent violations has been scheduled for 9:00 a.m. (CDT) on September 21, 1995, at the Region III office. The purposes of this conference are to discuss the apparent violations, their causes and safety significance; to provide you the opportunity to point out any errors in our inspection report; and to provide an opportunity for you to present your proposed corrective actions. In particular, we expect you to address the following: 1) the safety significance of the loss of the battery exhaust ventilation system; 2) the root cause(s) of this event; 3) the recurring nature of the failure of your staff to understand the design basis of the plant and attendant support systems including the adequacy of the corrective actions associated with the Control Room Ventilation event described in Inspection Report 94015; 4) the failure of your staff to understand that the alteration of a safety related support system constituted a change to the configuration of the plant which could have resulted in an unreviewed safety question; 5) the method Braidwood will use to ensure that all other annunciator response procedures are adequate and when followed will not result in the operation of the plant outside the design basis; 6) the motive force and reliability of the 60 CFM reverse air flow with the 211 battery exhaust ventilation system secured; and 7) the result of testing to determine the hydrogen distribution in the battery area when the 211 battery exhaust ventilation was secured.

In addition, this is an opportunity for you to provide any information concerning your perspective on: 1) the severity of the issue; 2) the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy; and 3) the possible basis for exercising discretion in accordance with Section VII of the Enforcement Policy. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding these apparent violations is required at this time.

This conference will be open to public observation in accordance with the Commission's continuing trial program as discussed in the enclosed *Federal Register* notices (Enclosure 2). Although not required, we encourage you to provide your comments on how you believe holding this conference open to public observation affected your presentation and your communications with the NRC.

K. Kaup

3

August 29, 1995

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Sincerely,

/s/ J. A. Grobe (for)

Geoffrey E. Grant, Director
Division of Reactor Safety

Docket No.(s) 50-456; 50-457
License No.(s) NPF-72; NPF-77

- Enclosures: 1. Inspection Reports
 No. 50-456/95011(DRS);
 No. 50-457/95011(DRS)
 2. Federal Register Notices

- cc w/encls: J. C. Brons, Vice President,
 Nuclear Support
 T. Tulon, Station Manager
 K. Bartes, Regulatory Assurance
 Supervisor
 D. Farrar, Nuclear Regulatory
 Services Manager
 Richard Hubbard
 Nathan Schloss, Economist,
 Office of the Attorney General
 State Liaison Officer
 Chairman, Illinois Commerce Commission

Distribution:

Docket File w/encls	DRS w/encls	LPM, NRR w/encls
PUBLIC IE-01 w/encls	RIII PRR w/encls	IPAS w/encls
OC/LFDCB w/encls	SRI's, Braidwood, Byron,	
DRP w/encls	Zion w/encls	

SEE ATTACHED CONCURRENCES

DOCUMENT NAME: G:\DRS\BRA95011.INP

To receive a copy of this document, indicate in the box: "C" = Copy w/o attachment/enclosure "E" = Copy w/attachment/enclosure "N" = No copy

OFFICE	RIII:DRS	RIII:DRS	RIII:DRP	RIII:EIC	RIII:DRS
NAME	Cobey/kjc	Jordan	Farber	Burgess	Grant
DATE	08/ /95	08/ /95	08/ /95	08/29/95	08/29/95

OFFICIAL RECORD COPY

K. Kaup

3

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Sincerely,

Geoffrey E. Grant, Director
Division of Reactor Safety

Docket No.(s) 50-456; 50-457
License No.(s) NPF-72; NPF-77

Enclosures: 1. Inspection Reports
No. 50-456/95011(DRS);
No. 50-457/95011(DRS)
2. Federal Register Notices

cc w/encls: J. C. Brons, Vice President,
Nuclear Support
T. Tulon, Station Manager
K. Bartes, Regulatory Assurance
Supervisor
D. Farrar, Nuclear Regulatory
Services Manager
Richard Hubbard
Nathan Schloss, Economist,
Office of the Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission

Distribution:

Docket File w/encls DRS w/encls LPM, NRR w/encls
PUBLIC IE-01 w/encls RIII PRR w/encls IPAS w/encls
OC/LFDCB w/encls SRIs, Braiwood, Byron,
DRP w/encls Zion w/encls

DOCUMENT NAME: G:\DRS\BRA95011.INP

To receive a copy of this document, indicate in the box: "C" = Copy w/o attachment/enclosure "E" = Copy w/attachment/enclosure "N" = No copy

OFFICE	RIII:DRS	C	RIII:DRS	E	RIII:DRP	E	RIII:EIC		RIII:DRS	
NAME	Cobey/kjc		Jordan <i>mgj</i>		Farber <i>mf</i>		Burgess		Grant	
DATE	08/28/95		08/28/95		08/28/95		08/ /95		08/ /95	

OFFICIAL RECORD COPY