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January 22, 1992

U.S. Nuclear Regulatory Commission  
 Attn: Document Control Desk  
 Washington, DC 20555

Subject: Braidwood Nuclear Power Station Units 1 and 2  
 Response to Notice of Violation  
 Inspection Report Nos. 50-456/91024; 50-457/91024  
NRC Docket Numbers 50-456 and 50-457

Reference: B. Clayton letter to Cordell Reed dated  
 December 27, 1991 transmitting NRC Inspection Report  
 50-456/91024; 50-457/91024

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 one Severity Level IV violation requiring a written response. The violation concerned the failure to comply with the Out of Service procedure. CECo's response is provided in the following 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,

T.J. Kovach  
 Nuclear Licensing Manager

Attachments

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

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## ENCLOSURE

### RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORT 456/91024; 457/91024

#### VIOLATION:

10 CFR Part 50, Appendix B, Criterion V, as implemented by Commonwealth Edison Company's Quality Assurance Program, requires, in part, that activities affecting quality be accomplished in accordance with documented instructions, procedures or drawings. Administrative Procedure BwAP 330-1, "Station Equipment Out-of-Service (OOS) Procedure," Revision 12, Paragraph C.3.a.(2) requires for activities requiring verification that the assigned operator verify proper placement of each OOS tag and the equipment OOS position.

Contrary to the above, on November 4, 1991, after verification was determined necessary to place the Unit 2 "2A" seal filter out of service, the operator failed to verify that the OOS tags were placed on the proper equipment and that the equipment was in the proper OOS position.

#### REASON FOR THE VIOLATION

On November 4, 1991 an OOS was placed on the Unit 1 "1A" seal filter rather than the Unit 2 "2A" seal filter. The OOS was intended to isolate and drain the "2A" seal filter in order to change the filter. Operating personnel failed to properly verify that the OOS tags were placed on the proper equipment and that the equipment was in the proper OOS position. When the floor plug was removed to change the "2A" filter, the filter housing filled with contaminated water and overflowed.

Investigation of this event identified that the operators involved went to the wrong valve location and did not read the valve tags fully. Construction tags, which can be more difficult to read than normal valve tags were affixed to the equipment. The operators concentrated on identifying the correct valve number and train letter but failed to recognize that they were on the wrong unit. Additionally, the operator failed to follow Braidwood Station Administrative Procedure, BwAP 330-1 "Station Equipment Out of Service" when performing independent verification.

#### CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

The Unit 2 "2A" seal filter was immediately isolated to prevent any additional spillage and the "2B" filter was placed in operation. The area around the "2A" seal filter, where water had spilled, was decontaminated and cleaned.

Braidwood Station's Senior Management recognizes that a thorough review of the independent verification program is warranted because of this event. The Assistant Superintendent of Operations has organized a team of station personnel to review the independent verification program and make recommendations for improvement. The team has proposed the development of a procedure that would consolidate the existing segments of the independent verification program, along with program enhancements, into one procedure.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION:

Senior station managements' expectations for removing equipment from service properly along with the correct method for performing independent verification were reinforced with the individuals involved in this event.

The Assistant Superintendent of Operations (ASO) discussed this event with both licensed and nonlicensed operating personnel in tailgate training sessions. Emphasis was placed on the failure to meet performance expectations with respect to performing OOS and independent verification activities.

The description tags on the valves were removed and replaced with more visible tags.

To assist station personnel in locating unit specific seal filter valves, unit colors will be painted on the floors in the valve rooms that contain the seal filter valves. This is expected to be completed by March 1, 1992.

A procedure will be developed that consolidates the existing segments of the independent verification program, along with enhancements to the program, into one procedure. The expected completion dated for this procedure is July 1, 1992.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved when the Unit 2 "2A" seal filter was properly isolated and the personnel involved were counselled on adherence to the OOS procedure.