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

February 11, 1992
BW/92-0071

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Dear Sir:

The enclosed Licensee Event Report from Braidwood Generating Station is being transmitted to you in accordance with the requirement of 10CFR50.73(a)(2)(i)(B) which requires a 30-day written report.

This report is number 92-001-00, Docket No. 50-456.

Very truly yours,

K. L. Kofron
Station Manager
Braidwood Nuclear Station

KLK/DN/dla
482/ZD85G

Enclosure: Licensee Event Report No. 92-001-00

cc: NRC Region III Administrator
NRC Resident Inspector
INPO Record Center
CECo Distribution List

IE22
1/1

LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1)	Docket Number (2)	Page (3)
Braidwood 1	0 5 0 0 0 4 5 6	1 of 0 3

Title (4)

Technical Specification Violation caused by Procedure Deficiency

Event Date (5)			LER Number (6)			Report Date (7)			Other Facilities Involved (8)	
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)
0 1	1 4	9 2	9 2	0 0 1	0 0	0 2	1 1	9 2	None	0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)			
1		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
0 9 6		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	Other (Specify
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	in Abstract
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	below and in
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	Text)

LICENSEE CONTACT FOR THIS LER (12)

Name	TELEPHONE NUMBER
	AREA CODE
M. Prospero, Assistant Technical Staff Supervisor Ext. 3119	8 1 5 4 5 8 - 2 8 0 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

		Expected Submission Date (15)	Month	Day	Year
Yes (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e, approximately fifteen single-space typewritten lines) (16)

On January 12, 1992 the 0B Hydrogen Recombiner was taken Out-of-Service (OOS) for inspection and planned maintenance. On January 14, 1992 the 1A Diesel Generator (DG) was scheduled for a maintenance outage. The action statements, applicable to an inoperable diesel generator, of Technical Specification 3.8.1.1 were reviewed. Action statement C.1 was applicable and required that, "with one diesel inoperable, verify that: All required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE." To assist in complying with the requirements contained in this action statement, Limiting Condition for Operation Action Requirement (LCOAR) procedure 1BwOS 8.1.1-1a was used. The guidance for required subsystems in the LCOAR procedure did not specifically include the 0B Hydrogen Recombiner. Based on this information, maintenance was allowed to proceed on the 1A DG. At 0440, the 1A DG was declared inoperable. At 1234 on January 15, 1992 the 0B Hydrogen Recombiner was returned to service. On January 21, 1992 after reviewing the requirements for system operation following a Loss-of-Coolant Accident, it was determined that action statement C.1 of Technical Specification 3.8.1.1 was applicable to the Hydrogen Recombiners. At this time, the event was determined to be reportable in accordance with 10CFR50.73(a)(2)(i)(B).

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: Braidwood 1; Event Date: January 14, 1992; Event Time: 0440;

Mode: 1 - Power Operation; Rx Power: 96%;

RCS [AB] Temperature/Pressure: NOT/NOP

B. DESCRIPTION OF EVENT:

On January 12, 1992 the 0B Hydrogen Recombiner (0G) [WE] was taken Out-of-Service (OOS) for inspection and planned maintenance. The applicable Technical Specification action statement was entered and a 30 day restoration time clock started. Limiting Condition for Operation Action Requirement (LCOAR) 1BwOS 6.4.2-1a was initiated to track the time clock.

On January 14, 1992 the 1A Diesel Generator (DG) [EK] was scheduled to be taken OOS for a maintenance outage. The Station Control Room Engineer (SCRE) (licensed-SRO) reviewed the action statements, applicable to an inoperable diesel generator, of Technical Specification 3.8.1.1. Action statement c.1 was applicable and required that, "with one diesel inoperable, verify that: All required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE."

To assist the SCRE in complying with the requirements contained in this action statement, LCOAR procedure 1BwOS 8.1.1-1a was used. The guidance for required subsystems in the LCOAR procedure did not specifically include the 0B Hydrogen Recombiner. Based on this information and that the activity had previously been screened and placed on the daily work schedule, maintenance was allowed to proceed on the 1A DG. At 0440, the 1A DG was declared inoperable.

Later in the morning, during a review of current LCOAR procedures in effect, an Assistant Technical Staff Supervisor (ATSS) questioned the acceptability of taking the 1A DG OOS with the 0B Recombiner inoperable. The concern of the ATSS was brought to the attention of the Regulatory Assurance Supervisor (RAS) for further clarification. The RAS then discussed the issue with the Production Superintendent.

As a prudent measure, steps were taken to discontinue the maintenance work on the 0B Recombiner such that it could be declared operable as soon as possible. The RAS then began to investigate whether the simultaneous inoperability of the 1A DG and 0B Recombiner was allowed by Technical Specifications. To determine the necessary interpretation of the Technical Specification requirement, various on-site departments were requested by the RAS to provide their technical engineering judgement.

On January 15, 1992 at 1234 the 0B Hydrogen Recombiner was returned to service.

Extensive research was performed by Site Regulatory Assurance, Site Engineering, Operations, and Corporate Nuclear Licensing on the proper interpretation of the Technical Specification requirements between January 15 and January 21, 1992.

On January 21, 1992 after reviewing the requirements for system operation following a Loss-of-Coolant Accident (LOCA) in the Updated Final Safety Analysis Report, it was determined that action statement c.1 of Technical Specification 3.8.1.1 was applicable to the Hydrogen Recombiners.

This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B) - any operation prohibited by the plant's Technical Specifications.

C. CAUSE OF EVENT:

The cause of the event was a procedural deficiency. The LCOAR procedure failed to provide the needed guidance for determining that the Hydrogen Recombiners were a required subsystem.

D. SAFETY ANALYSIS:

This event had no effect on the safety of the plant or the public. The 0A Hydrogen Recombiner was OPERABLE at all times. Off-site power was also available to provide electrical power to both units. Crosstie capability between the units was also available. The immediate operation of the Hydrogen Recombiners following a large-break LOCA is not required. After a LOCA, the containment Hydrogen concentration will remain below an explosive level if the Recombiner operation is started within approximately 20 hours.

E. CORRECTIVE ACTIONS:

At 1234 on January 15, 1992 the 0A Hydrogen Recombiner was returned to service and declared OPERABLE.

The applicable LCOAR procedures will be revised to provide specific subsystem operability requirements when a DG is inoperable. This item will be tracked to completion by Action Item No. 456-180-92-00101.

F. PREVIOUS OCCURRENCES:

NONE

G. COMPONENT FAILURE DATA:

This event was not the result of component failure, nor did any components fail as a result of this event.