

October 17, 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 REPORT NOS. 50-456/95014(DRS); 50-457/95014(DRS);
AND NOTICE OF VIOLATION

Dear Mr. Kaup:

This refers to the Pre-Decisional Enforcement Conference conducted by Mr. Hubert J. Miller, Regional Administrator, and other members of the Region III staff on September 21, 1995. That conference concerned the circumstances surrounding the installation of an unauthorized temporary alteration to the 211 battery exhaust ventilation system. We have enclosed a report summarizing the conference discussion. The conference was open to the public.

On July 21, 1995, an NRC inspector identified that the 211 battery room ventilation system was out of service and a portable fan exhausting air from that room had been chained to one of the room's two fire dampers. The inspector expressed concern that a temporary alteration had been installed in the battery room ventilation system without a safety evaluation. Your staff initiated corrective actions which returned the battery exhaust ventilation system to service on July 22, 1995.

Based on the results of this inspection, the NRC has determined that violations of NRC requirements occurred. These are cited in the enclosed Notice of Violation (Notice) and include: (1) failure to perform an operability assessment for the 125-Volt D.C. bus fed from battery 211 while the battery exhaust ventilation 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; (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.

The major factors contributing to these violations appeared to be: (1) the lack of design basis knowledge and the inability to effectively use design basis information; (2) your failure to follow procedures, coupled with an inadequate procedure; (3) the lack of understanding of the proper

implementation of the Temporary Alteration System; (4) a high threshold for problem identification which manifested itself in the degraded material condition of the 211 battery exhaust ventilation system; and (5) the lack of a conservative operating philosophy and questioning attitude by your staff demonstrated by the missed opportunities to identify this issue.

Because the battery area atmosphere could develop an explosive mixture of hydrogen with the battery exhaust ventilation system inoperable, classification of this violation at Severity Level III was considered. However, subsequent testing with the battery exhaust ventilation system secured demonstrated that sufficient airflow was induced in the 211 battery area from other ventilation systems to maintain hydrogen concentration at an acceptable level with the batteries on a float charge. We concluded that the safety significance of this specific incident did not rise to that of a Severity Level III violation.

This battery room ventilation issue was identified concurrent with a detailed engineering inspection documented in Inspection Report Nos. 50-456/457/95010(DRP) issued September 20, 1995. Based on that inspection, we concluded that your staff had a high threshold for identifying problems, along with a lack of a questioning attitude and insufficient rigor toward resolving those problems which led to degrading material condition, weak test controls and poor engineering evaluations. There appears to be some similarity between several of these concerns and the factors that led to the battery room ventilation issues.

While our assessment during these inspections should not be construed as an overall assessment of your engineering performance during the SALP period, we are concerned about the apparent systemic nature of the causal factors disclosed during these inspections. You are required to respond to the enclosed Notice and should follow the instructions specified when preparing your response. To assure you develop a comprehensive action plan to address our concerns, the response to the enclosed Notice should be integrated with the response required by the Notice resulting from Inspection Report Nos. 50-456/457/95010(DRP) dated September 20, 1995. Further, your response should address your actions in response to the engineering issues documented in that inspection report.

This integrated response is required to be submitted to this office within 30 days of the date of this letter. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements. As indicated in the September 20, 1995, letter, we plan to meet with you to further discuss these issues and your plans to rectify our concerns following receipt of your response.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, the enclosures and your response to this letter will be placed in the NRC Public Document Room. To the extent possible, your response should

not include any personal privacy, proprietary, or Safeguards information so that it can be placed in the PDR without redaction.

The response directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. 96-511.

We will gladly discuss any questions you have concerning these matters.

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. Notice of Violation
- 2. Enforcement Conference Report
No. 50-456/95014(DRS);
No. 50-457/95014(DRS)

- 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

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*SEE ATTACHED CONCURRENCES

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Geoffrey E. Grant, Director
Division of Reactor Safety

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MEETING SUMMARY

Four apparent violations identified during the inspection were discussed, along with the corrective actions taken or planned by the licensee. The apparent violations involved (1) a 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) a 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) a failure to follow an annunciator response procedure; and (4) a failure to perform a safety evaluation to demonstrate that a change to the facility would not have resulted in an unreviewed safety question.