

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station

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

During an NRC inspection conducted on July 17 through August 21, 1995, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violations are listed below:

1. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

- a. BwAP 330-10, "Operability Assessment Process," requires, in part, that an operability assessment be performed when any system, structure, or component (SSC), which supports any SSC explicitly subject to the facility's Technical Specifications or Updated Safety Analysis Report in order to perform their specified safety function(s), involves a loss of quality or functional capability.

Contrary to the above, from November 22 through December 2, 1994, and July 19 through July 22, 1995, an operability assessment was not performed when the battery 211 exhaust ventilation system was inoperable, a system which supports the 125-Volt D.C. Bus 211 which was subject to the facility's Technical Specifications.

This is a Severity Level IV violation (Supplement I).

- b. Contrary to the above, as of August 4, 1995, the Control Room Annunciator Response Procedure, BwAR 2VX01J-1-A6, Revision 5, "Battery Room 211 Exhaust Fan 2VE03C Diff Press High," was not adequate to ensure that the design limit of hydrogen in the battery area would not be exceeded; in that, this procedure did not require hydrogen monitoring or specify a sampling frequency.

This is a Severity Level IV violation (Supplement I).

- c. The Control Room Annunciator Response Procedure, BwAR 2VX01J-1-A6, "Battery Room 211 Exhaust Fan 2VE03C Diff Press High," requires in part, that with the battery exhaust ventilation system secured and at the Shift Engineer's discretion either perform a H₂/O₂ concentration sample in the battery room and/or provide an alternate means of ventilation.

Contrary to the above, from November 22 through December 2, 1994, the 211 battery exhaust ventilation system was inoperable; and, the licensee did not monitor the 211 battery room for H₂/O₂ concentration or provide for an alternate means of ventilation.

This is a Severity Level IV violation (Supplement I).

2. 10 CFR Part 50.59, "Changes, Tests, and Experiments," requires, in part, that the licensee shall maintain records of changes in the facility and that these records must include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, on July 19, 1995, the licensee changed the configuration of the 211 battery room ventilation system by installing a portable fan and did not perform the required safety evaluation to demonstrate that the change would not result in an unreviewed safety question.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility which is subject to this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or Safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois, this
17th day of October, 1995