

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Nuclear Power Station
Units 1 and 2

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

During an NRC inspection conducted on February 18 through March 6, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is described below:

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be accomplished by documented instructions, procedures, or drawings appropriate to the circumstances.

Commonwealth Edison White Paper MOV-WP101, "Justification of Using Coefficient of Friction of $\mu = 0.15$ for the Torque to Thrust Conversion of Motor Operated Valves (MOV) with Rising Stems," provided the technical bases for use of stem factors as low as 0.15 and specified a cleaning and lubrication frequency of 18 months.

Commonwealth Edison's MOV lubrication program (LUBQ) specified the use of EP-1 lubricant for most valve stems, including MOVs 2SI8807A, 2SI8807B and ICC9473.


Contrary to the above:

- A. As of February 18, 1992, stem factors of .15 and lower were being used to calculate some torque switch settings without following the lubrication requirements specified by engineering in Commonwealth Edison White Paper MOV-WP101 (456/92005-02A(DRS); 457/92005-02A(DRS)).
- B. As of February 18, 1992, procedure BwFP FS-1, "Inspection of Limitorque Gear Case Lubrication," Revision 0, Temporary Change 5624 conflicted with the station lubrication program (LUBQ) in that it specified, and resulted in, the use of Neolube on valves 2SI8807A, 2SI8807B and ICC9473 (456/92005-02B(DRS); 457/92005-02B(DRS)).

This is a Severity Level IV Violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison Company 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 U. S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, and a copy to the NRC Resident Inspector at the Braidwood facility within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly 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. 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.

Dated at Glen Ellyn, Illinois
this 24th day of March, 1992



M. A. Ring, Chief
Engineering Branch