



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

March 30, 1992

U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2 Supplemental  
Response to Notice of Violation Associated with Inspection  
Report 50-456/92002; 50-457/92002 NRC Docket Numbers 50-456  
and 50-457

References: (a) L. R. Greger letter to Cordell Reed dated February 7,  
1992 transmitting NRC Inspection Report 50-456/92002;  
50-457/92002

(b) T. J. Kovach letter to USNRC dated March 6, 1992  
transmitting initial response to NRC Inspection  
Report 50-456/92002; 50-457/92002

Enclosed is a Commonwealth Edison Company (CECo) supplemental response  
to the Notice of Violation (NOV) transmitted by the Reference (a)  
report. The attached response provides clarification on the reasons  
for the identified violations and specifies additional interim actions  
taken. The attached response supercedes and replaces the Reference  
(b) response.

If there are any questions or comments regarding this response, please  
contact Perry Barnes, Compliance Supervisor, at 708/515-7278.

Sincerely,

*P. L. Barnes for*

T. J. Kovach  
Nuclear Licensing Manager

Attachment

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

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## ATTACHMENT A

### RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT 456/92002; 457/92002

#### VIOLATION (456/92002-01)

10 CFR Part 50.54(g) requires that a license authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 10 CFR Part 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. Appendix E states that the emergency plan will provide a description of the specialized training which emergency response personnel assigned to repair and damage control teams will receive. The GSEP, Section 8.2.1, states that emergency response personnel assigned to repair and damage control teams will perform emergency response activities as an extension of their normal duties and will be trained each year as part of their duty specific training.

Contrary to the above, emergency response personnel assigned to repair and damage control teams did not receive specialized emergency preparedness training, relevant to their role in the emergency response organization, each year as part of their duty specific training.

#### REASON FOR THE VIOLATION

Commonwealth Edison agrees that the specialized training provided was not fully adequate.

The process in place to implement lesson plan changes was not effective in that no administrative tracking tool was used. The process relied on the Emergency Preparedness (EP) Trainer to identify and implement the necessary changes.

In early 1990, Nuclear Services Emergency Preparedness (NSEP) identified the need to streamline, standardize, and focus emergency response training at the stations. Development of a new training system was initiated to include three major elements: (1) a standardized matrix of EP instruction modules versus director assignments; (2) minimum Technical Knowledge Objectives (TKOs); and (3) Corporate policies for implementation of EP training at the stations.

Guidance was provided to the stations, which addressed a set of recommended TKOs for personnel assigned to emergency repair and damage control teams. Braidwood had not fully incorporated these recommended objectives into the appropriate lesson plans.

Specialized emergency preparedness training for personnel assigned to emergency repair and damage control teams was provided through (1) annual job specific training, (2) Nuclear General Employee Training and (3) Annual Station Training. However, it did not include all TKOs included in NSEP Guidance Recommendation EPGR-TR-0201 Module S-3.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A review of all EP training lesson plans to identify where additional information needs to be provided has been completed. This review identified those lesson plan changes that must be made to reflect the TKOs contained in Guidance Recommendation EPGR-TR-0201. Lesson plan changes are expected to be completed by April 30, 1992.

The annual training conducted for repair and damage control teams has been revised to incorporate the TKOs of EPGR-TR-0201 Module S-3. Approximately 118 of 283 personnel have completed annual training with the updated technical knowledge objectives. Training for the remaining personnel has been accelerated and is expected to be completed by August 31, 1992.

As an interim measure, pending completion of accelerated annual training, tailgate training has been provided to appropriate work groups covering the Module S-3 TKOs.

#### CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

Braidwood Station will begin tracking the review and updating of GSEP training lesson plans using the normal Training Department change tracking system. This will ensure the revision process and schedule is administratively tracked to completion.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved with the completion of the accelerated training for personnel assigned to emergency repair and damage control teams, which is expected by August 31, 1992.

VIOLATION (456/92002-02):

10 CFR Part 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 10 CFR Part 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. The Generating Station Emergency Plan (GSEP), Section 8.5.7, states that Emergency Plan Implementing Procedures and corresponding lesson plans shall be developed consistent with the GSEP within 4 months of any GSEP revision.

Contrary to the above, lesson plans corresponding to the GSEP were not revised within four months of the revision of the GSEP. The GSEP was revised in March 1991, and, as of January 1992, relevant lesson plans had not been revised to be consistent with the current GSEP revision.

REASON FOR THE VIOLATION:

Commonwealth Edison acknowledges the violation. The process in place to implement lesson plan changes was not effective. In particular, no administrative tracking tool was used for lesson plan changes. The process relied on the Emergency Preparedness (EP) Trainer to identify and implement the necessary changes. A contributor was the EP Trainer's unfamiliarity with a requirement, implemented in Section 8.5 of GSEP Revision 7, to ensure that lesson plans are developed consistent with the GSEP within 4 months of any GSEP revision.

The training which was provided to station emergency response personnel whose actions are directed by Emergency Plan Implementing Procedures (EPIPs), including Director level positions, was consistent with GSEP Revision 7. The training provided these individuals was based on and used position-specific EPIPs which had been updated to GSEP Revision 7. Therefore, the actions of those individuals whose training was in question would have been directed by Directors whose training was consistent with GSEP Revision 7.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A review of the GSEP training lesson plans to identify where revisions need to be made to bring them into agreement with GSEP Revision 7 has been completed. Lesson plans which require revision have been identified and appropriate changes are being implemented. Revisions are expected to be completed by April 30, 1992.

#### CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

Braidwood Station will begin tracking the review and updating of GSEP training lesson plans using the normal Training Department change tracking system. This will ensure the revision process and schedule is administratively tracked to completion.

Upon issuance of revisions to the GSEP Manual, Nuclear Services Emergency Preparedness (NSEP) will issue a letter highlighting the need to complete changes to station procedures and lesson plans within four months in accordance with GSEP Section 8.5. The issuance of this letter will be included as part of an administrative procedure which is under development by NSEP to provide guidance for the control of GSEP and GSEP Annex revisions (CEPIP 100-04). The procedure is expected to be completed by April 30, 1992.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved with completion of the revision of the GSEP training lesson plans which is expected by April 30, 1992.