Commonwealth Edison Company Braidwood Generating Station Route #1, Box 84 Braceville, IL 60407-9619 Tel 815-458-2801



December 4, 1995

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

Subject:

Braidwood Nuclear Power Station Units 1 and 2

Reply to a Notice of Violation from

Inspection Report Number 50-456/457/95013 NRC Docket Numbers 50-456; 50-457

References:

 M. J. Farber letter to K. Kaup dated November 8, 1995, transmitting Notice of Violation from NRC Inspection Report 50-456/457/95013

Enclosed is Commonwealth Edison Company's (ComEd) response to the Notice of Violation (NOV) which was transmitted with the letter identified in reference 1. The NOV cited one Severity Level IV violation requiring a written response. ComEd's response is provided in the attachment.

The following commitment to the NRC is included in the attachment:

Licensed Operator training is being revised to further promote team building and to include management's expectations that reactor operators and senior reactor operators are equally responsible in ensuring that the units are in compliance with the Technical Specifications. The effectiveness of this training will be assessed by July 31, 1996, at the midpoint of the 1996 training cycle.

If your staff has any questions or comments concerning this letter, please refer them to Kevin Bartes, Braidwood Regulatory Assurance Supervisor, at (815)458-2801, extension 2980.

Karl L. Kaup

Site Vice President Braidwood Station

KLK/JML/tts Attachment

cc:

H. J. Miller, NRC Regional Administrator - RIII

R. R. Assa, Project Manager - NRR

C. J. Phillips, Senior Resident Inspector

K. A. Strahm, Vice President PWR Operations

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ATTACHMENT I

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/457/95013

VIOLATIONS (50-456/457/95013-01):

Technical Specification 3.3.1 requires that with a main control room air intake radiation monitor inoperable, within one hour switch to the redundant train of control room ventilation, or isolate the control room ventilation system and initiate operation of the control room make-up system.

Contrary to the above, on September 8, 1995, the OA main control room air intake radiation monitor was declared inoperable and the licensee failed to switch to the redundant train of control room ventilation, or isolate the control room ventilation system and initiate operation of the control room make-up system within one hour as required.

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

REASON FOR THE VIOLATION:

A failed o-ring on radiation monitor OPR32J skid's gas channel detector plug allowed leakage to the atmosphere and produced a low flow condition within the skid which rendered the monitor inoperable. Because of personnel error, corrective actions were not performed in a timely manner. Additionally, there was a lack of teamwork and a lack questioning attitude between the Unit Supervisor, Unit 1 Nuclear Station Operator (NSO), Unit 2 NSO and the extra NSO. Actions taken were not adequate to ensure the Technical Specification requirements were met within the one hour time frame.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Personnel involved in the event were counseled concerning their performance relating to the event and management's expectations regarding teamwork, standards, and a questioning attitude.

Each operating crew was briefed on the circumstances of the event and how management's expectations were not met.

The failed o-ring was replaced.

CORRECTIVE STEPS TAYEN TO AVOID FURTHER VIOLATION:

Operating Department Meme andum #7-95, 'Individual Responsibilities for Technical Specification Adherence," was issued and communicated to Operating personnel. The purpose of this policy is to clearly define the obligation of the shift license holders to ensure that proper Technical Specifications are entered and adhered to when the required plant equipment does not meet conditions of operability.

Teamwork is being stressed during simulator training for Operating Department personnel. This is accomplished during briefs held prior to the simulator training and during the actual simulator training.

ATTACHMENT I

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/457/95013

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION (Continued):

Licensed Operator training is being revised to further promote team building. Training will include management's expectations that reactor operators and senior reactor operators are equally responsible in ensuring that the units are in compliance with the Technical Specifications. The effectiveness of this training will be assessed by July 31, 1996, which is the midpoint of the 1996 training cycle.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on September 8, 1995, when the action requirements were met. Repairs to the radiation monitor skid were completed on September 13, 1995, and the action requirement was exited.