



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 23, 1992

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Braidwood Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-456/92005; 50-457/92005
NRC Docket Numbers 50-456 and 50-457

Reference: M. Ring letter to C. Reed dated March 24, 1992
transmitting NRC Inspection Report
50-456/92005; 50-457/92005

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) which was transmitted with the reference letter and Inspection Report. The NOV cited one Severity Level IV violation requiring a written response. The violation concerns aspects of the the Motor Operated Valve Program.

If your staff has any questions or comments concerning this letter, please refer them to Denise Saccomando, Compliance Engineer at (708) 515-7285.

Sincerely,

P. L. Barnes for

T.J. Kovach
Nuclear Licensing Manager

Attachment

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

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 456/92005; 457/92005

VIOLATION (456/92005-02A; 456/92005-02B):

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 MOV's 2SI8807A, 2SI8807B and 1CC9473.

Contrary to the above:

- A. As of February 18, 1992, stem factors of 0.15 and lower were being used to calculate scene torque switch settings without following the lubrication requirements specified by engineering in Commonwealth Edison White Paper MOV-WP101.
- 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 1CC9473.

**RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 456/92005; 457/92005**

REASON FOR THE VIOLATION: (EXAMPLE A)

Commonwealth Edison agrees that Braidwood Station did not follow the lubrication requirements specified by the Nuclear Engineering Department (NED) Mechanical and Structural Design group in Commonwealth Edison White Paper MOV-WP101. The White Paper did recommend increased lubrication frequency for those valves where the thrust window was calculated using a less conservative coefficient of friction. The station's interpretation of the White Paper was that a 36 month lubrication frequency was applicable unless an accelerated frequency was explicitly stated on the MOV data sheet. It was NED's intent that if the target thrust window was given on the left (lower friction factor) side of the data sheet, an accelerated lubrication frequency was required. This resulted in valves whose data sheets were based on less conservative coefficients of friction not being identified for stem lubrication on an increased frequency.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED: (EXAMPLE A)

Braidwood station reviewed all MOVs that were incorporated in the Generic Letter 89-10 program. The review identified 36 MOV's which required increased stem lubrication frequencies of 18 months. Of these, 29 MOV's are within the 18 month lubrication frequency. The remaining 7 MOV's (1/2CV8355A, 1CV8355B, 1/2CV8355C, 1/2CV8355D) fall outside the 18 month frequency. These valves can only be lubricated when the respective unit is shutdown. They are being evaluated by the NED Pressurized Water Reactor (PWR) Systems group to determine their acceptability with decreased lubrication frequencies. The evaluation of the 7 MOV's is scheduled to be completed by May 15, 1992. Appropriate actions will be taken based on the evaluation results.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION: (EXAMPLE A)

A letter was issued by the NED Mechanical and Structural Design group to the station clarifying the information given on the data sheets for the use of less conservative stem factors combined with increased stem lubrication frequency requirements.

The lubrication frequencies for the 36 MOV's identified have been revised in the Station Lubrication System program (LUBQ) to agree with the 18 month frequency requirement.

NED Mechanical and Structural Design group will revise White Paper MOV-WP101 to clarify the requirement of increased lubrication frequencies. This revision is expected to be completed by September 30, 1992.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED: (EXAMPLE A)

Full compliance will be achieved with the dispositioning of the 7 MOV's being evaluated by the NED PWR Systems group scheduled for May 15, 1992.

**RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 456/92005; 457/92005**

REASON FOR THE VIOLATION: (EXAMPLE B)

Commonwealth Edison agrees that procedure BwFP FS-1, Temporary Procedure Change 5624 (dated 11/21/90) stated that valve stems should be cleaned and lubricated with Neolube. This conflicted with the Station Lubrication System Program (LUBQ) which stated that various valves, including 2SI8807A, 2SI8807B and 1CC9473, are to be lubricated with Exxon EP-1. Although Neolube is an approved valve stem lubricant, in 1988, the station decided to change the type of lubricant used on valve stems from Neolube to Exxon EP-1, which is used in each valve's main gear case. Procedure BwFP FS-1 was inadvertently not updated following the 1988 change to LUBQ.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED: (EXAMPLE B)

On February 25, 1992, Temporary Procedure Change 6153 was put in place to address referencing the LUBQ data base for the correct stem lubricant to be used when performing valve stem lubrication. On March 12, 1992, BwFP FS-1, Revision 1 was authorized for use. This revision incorporated Temporary Procedure Change 6153 as well as other changes to enhance the procedure.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION: (EXAMPLE B)

The LUBQ data base was reviewed and revised as necessary to ensure that it specified using the correct stem lubricant for each motor operated valve.

A review of Fuel Handling lubrication procedures identified that BwFP FS-1 was the only procedure which addressed the type of lubricant to be used on valve stems. No other procedures required revision.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED (EXAMPLE B)

Full compliance was achieved with the Revision of Procedure BwFP FS-1, Revision 1 dated March 12, 1992.