



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

April 29, 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. 50-456/92004; 50-457/92004  
NRC Docket Numbers 50-456 and 50-457

Reference: B. Clayton letter to C. Reed dated March 30, 1992,  
transmitting NRC Inspection Report  
50-456/92004; 50-457/92004

Enclosed is Commonwealth Edison Company's (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 the documentation of abnormal valve positions. CECo's response is provided in the following attachment.

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  
RESPONSE TO NOTICE OF VIOLATION  
NRC INSPECTION REPORT  
50-456/92004; 50-457/92004

VIOLATION

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, during January 26-28, 1992, normally open valve ONTO99, was maintained in the closed position, without being documented in the "Component Abnormal Position Log" as required by step C.8 of Administrative Procedure BwAP 340-2, "Use of Mechanical and Electrical Lineups."

REASON FOR THE VIOLATION:

Commonwealth Edison agrees that shift personnel did not use the Component Abnormal Position Log in accordance with BwAP 340-2, "Use of Mechanical and Electrical Lineups." The appropriate documents were not used due to deficient work practices.

Prior to the event, a nitrogen system modification was in progress to provide a high pressure nitrogen source from a tube trailer bypassing the existing compressor. The modification had not been released to Operations although it had been used for an extended time period.

On January 25, 1992, Operations was restoring the nitrogen system after increasing the 1B and 1D Safety Injection (SI) accumulator pressures when a leak in the system was suspected. It was believed that the check valve downstream of the nitrogen compressor bypass valve (ONTO99) installed by the modification, was allowing backflow. In an effort to troubleshoot the leakage, on January 26, 1992, valve ONTO99 was closed, but was not documented in the Component Abnormal Position Log. Further troubleshooting was performed which resulted in three additional valves (ONT9338A, ONTO80D and ONTO81D) being closed. At this point, isolation of the high pressure nitrogen system from the low pressure nitrogen system was accomplished. The valve manipulations were documented in the Shift Foreman Turnover Log, but not in the Component Abnormal Position Log.

On January 28, 1992, Operations was unable to increase nitrogen pressure in the 1B and 1D SI accumulators and discovered that valves ONTO99 and ONT9338A were closed. These valves were opened and the SI accumulators were pressurized. A leak was then identified on the Unit 2 side of the nitrogen system. The nitrogen supply header isolation valves to the SI accumulators (2SI8965A and 2SI8965B) were closed to isolate the leak. These valves had been inappropriately left open, contrary to BwOP SI-8, "Increasing SI Accumulator Pressure," for operator convenience and ALARA considerations. On January 30, 1992, Operations identified the leak and initiated repairs. Valves ONTO80D and ONTO81D were then opened to place the nitrogen system in a normal lineup.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

A review was performed to determine if any additional modifications installed, but not yet released to Operations had any direct impact on plant operation or safety. No additional modifications were identified.

Operator Aid 92-009 was issued on February 3, 1992, to clarify operation of the nitrogen system pending the modification's release to Operations and completion of required training. The Operator Aid included piping diagrams showing what parts of the system were modified.

BwOP SI-8 was revised on February 3, 1992, to specifically reference procedure BwOP NT-9, "Nitrogen Tube Trailer Operation," for verification of nitrogen system availability prior to increasing SI accumulator pressure.

On February 19, 1992, the Assistant Superintendent of Operations issued a memo to Operating crews expressing expectations regarding procedural compliance. Items discussed included this event and appropriate actions to be taken when a procedure does not work or could be improved. Additionally, Operations management discussed their expectations with Operations Shift Engineers specifically regarding the importance of using the Component Abnormal Position Log.

On February 27, 1992, the Daily Orders issued by the Operating Engineer included a clarification of the nitrogen system status and system operation.

At the direction of the Assistant Superintendent of Operations, training for licensed operators was conducted on the administrative use and procedural requirements of the Component Abnormal Position Log in accordance with BWAP 340-2. This training was completed on April 3, 1992.

#### CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

An evaluation is being conducted on the use of the Component Abnormal Position Log. This review will be completed by May 15, 1992. Appropriate actions will be taken based on the evaluation results.

A General Information Notice (GIN) describing the subject event will be issued by May 31, 1992, to Station employees. This GIN will specifically address the importance of following procedures and suggest appropriate actions to be taken when a procedure could be improved. Additionally, the use of the Component Abnormal Position Log will be addressed.

This event and subject violation will be included in required reading packages for licensed and nonlicensed operators. Required reading packages will be issued by May 30, 1992.

A group comprised of representatives from the Technical Staff, Site Engineering, Construction, and Operations is evaluating the modification process, the out-of-service process and methods by which portions of modifications may be made available to operations. The evaluation will be completed by June 30, 1992. Appropriate actions will be taken based on the evaluation results.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on January 30, 1992, when the nitrogen system was placed in a normal lineup.

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