

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station, Unit 1

Docket No. 50-456
License No. NPF-72
EA 95-265

During an NRC inspection conducted on October 23 through November 21, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 3.8.1.2.b, requires, in part, that a minimum of one diesel generator be operable in Modes 5 and 6. With less than the minimum required A.C. power sources operable, immediately suspend all operations involving core alterations, positive reactivity changes, movement of irradiated fuel, or crane operation with loads over the spent fuel pool. In addition, when in Mode 5 with the reactor coolant loops not filled, or in Mode 6 with the water level less than 23 feet above the reactor vessel flange, immediately initiate corrective action to restore the required sources to operable status as soon as possible.

Contrary to the above, from October 3 to October 19, 1995, while in Modes 5 or 6, no diesel generators were operable and action was not taken to suspend all operations involving core alterations, positive reactivity changes, movement of irradiated fuel, or crane operation with loads over the spent fuel pool. In addition, in the same period, action was not taken to initiate corrective action to restore the required sources to operable status as soon as possible when in Mode 5 with the reactor coolant loops not filled, or in Mode 6 with the water level less than 23 feet above the reactor vessel flange. (01013)

- B. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

1. Contrary to the above, as of October 19, 1995, Braidwood Procedure BwHS 4002-071, Revision 4, "Inspection of Type DHP Switchgear and Switchgear Cubicles," an activity affecting quality, did not include adequate inspection requirements for the Type DHP breaker levering-in device. Specifically, Section F.17.2 required that the levering-in device be pulled out only halfway from the circuit breaker for inspection. However, to perform an adequate inspection for cracks; worn, broken, or damaged parts; and proper lubrication; the levering-in device must be completely removed from the breaker chassis and disassembled. (01023)
2. Contrary to the above, as of October 19, 1995, Braidwood Procedure BwOP AP-6, Revision 5E3, "Racking-in a 4160V or 6900V Air Circuit Breaker," an important activity affecting quality, did not include

appropriate acceptance criteria. Specifically, the procedure did not include the installation instruction from Westinghouse Instruction Book 32-253-4B, Page 29, Section 10, that when the breaker is fully engaged, the front steel barrier should be 1/4 inch or less from the cell frame angles. (01033)

This is a Severity Level III problem (Supplement I).

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 Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois
this 29th day of January 1996