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February 21, 1996

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 50-456/95016
NRC Docket Numbers 50-456

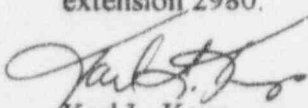
References: 1) H. J. Miller letter to M. J. Wallace dated January 29, 1996,
transmitting Notice of Violation from NRC Inspection
Report 50-456/95016

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 three violations categorized in the aggregate as a Severity Level III problem requiring a written response. ComEd's response is provided in the attachment.

The following commitments to the NRC are included in the attachment:

- ◆ In order to reinforce the need to identify problems, Operating and Engineering personnel will be interviewed to identify materiel condition deficiencies that could affect operation. These interviews will be completed by May 31, 1996.
- ◆ Replacement of the levering-in devices with the upgraded version for all ESF breakers is in progress. The replacement schedule is based on the availability of work windows and other opportunities.

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


Karl L. Kaup
Site Vice President
Braidwood Station

KLK/JML/tts 9603050413 960221
Attachment PDR ADOCK 05000456
Q PDR

040116 cc: H. J. Miller, NRC Regional Administrator - RIII
R. R. Assa, Project Manager - NRR
C. J. Phillips, Senior Resident Inspector

JED

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/95016

VIOLATION (50-456/95016-01):

- 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 reactor coolant loops not filled, or in Mode 6 with the water level less than 23 feet above the reactor vessel flange.

- 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, Braiwood 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.

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REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-456/95016

VIOLATION (50-456/95016-01 continued):

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," and 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.

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

REASON FOR THE VIOLATION:

A degraded levering-in device caused the 1B diesel generator output breaker not to be fully racked-in. Operating and Engineering personnel failed to realize that reliance on the indicating light and free-turning of the levering-in device could result in a false positive indication of a complete breaker rack-in.

Contributing to the violation were inadequate identification and resolution of degradation of the levering-in device, performing inspections of the levering-in device without breaker disassembly, the failure of the operator to notice that the breaker was not racked-in fully, and the failure to perform functional testing after racking-in the breaker.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Operating successfully racked-in the breaker and then closed it normally.

Operating visually checked the open ESF breakers to ensure that they were fully racked-in, and that the floor trip mechanisms were in the proper position.

The worn levering-in device in the diesel generator output breaker was replaced with an upgraded version.

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CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION:

Procedure BwOP AP-6, "Racking-In a 4160V or 6900V Air Circuit Breaker," has been revised to verify that the floor trip mechanism is reset, and to check that the front steel barrier is approximately 1/4" or less from the cubicle frame as observed at the lower left and right side of the breaker. This procedure was also revised to give direction when one of the required indications to ensure the breaker is fully racked-in is not received, or when the breaker appears abnormal. This direction includes the requirement to document the finding in a Problem Identification Form. Operator expectations have been communicated regarding the need to notify management of any instance in which repetitive action was needed.

Surveillance procedure BwHS 4002-071, "Inspection of Type DHP Switchgear and Switchgear Cubicles," has been revised to include removal of the levering-in device to allow for closer inspection along with application of a light coat of lubricant.

Procedure BwAP 300-1, "Conduct of Operations," has been revised to include functional testing of 4kv and 480 volt circuit breakers that are required to be operable to automatically close and supply power to ESF equipment or busses.

In order to reinforce the need to identify problems, Operating and Engineering personnel will be interviewed to identify materiel condition deficiencies that could affect operation. These interviews will be completed by May 31, 1996.

Replacement of the levering-in devices with the upgraded version for all ESF breakers is in progress. The replacement schedule is based on the availability of work windows and other opportunities.

Design basis knowledge training will be continued to facilitate operator communication of equipment conditions to System Engineers.

Station management continues to reinforce expectations with personnel including the need for a questioning attitude.

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CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION (continued):

Peer groups comprised of Engineers from the ComEd stations and corporate office have been established to share and compare information about system performance.

A comprehensive Materiel Condition Improvement Plan has been adopted. It has identified and prioritized Equipment Focus Areas which will address specific materiel condition issues.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on October 19, 1995, when the diesel generator output breaker was successfully racked-in and then closed normally.