

April 17, 1996

Mr. K. Kaup  
Site Vice President  
Braidwood Station  
Commonwealth Edison Company  
R.R. #1, Box 84  
Braceville, IL 60407

SUBJECT: MATERIEL CONDITION INSPECTION REPORT AND NOTICE OF VIOLATION

Dear Mr. Kaup:

This refers to the routine safety inspection conducted on February 5 through March 1, 1996, to assess equipment materiel condition at Braidwood. At the conclusion of the inspection, the findings were discussed with you and members of your staff identified in the enclosed report.

The inspection was conducted as a result of continuing NRC concern regarding Braidwood equipment materiel condition problems. The team assessed the current materiel condition of important structures, systems, and components as well as the effectiveness of the operations, maintenance, and engineering organizations in assuring sustained acceptable equipment performance. Areas examined during the inspection are identified in the report.

Our inspection concluded that Braidwood's current materiel condition was adequate. However, we noted several significant programmatic weaknesses impacting on your ability to improve equipment availability and reliability: maintenance work backlog was high and increasing; maintenance rework was not defined, accurately quantified, or adequately assessed for root cause; communications between engineering and maintenance were weak and thus limited the ability of both organizations to effectively resolve materiel condition problems; and, oversight of system engineers' weekly system walkdowns was not effective in ensuring that instances of equipment degradation were identified.

The NRC recognizes that steps have been taken to address materiel condition problems as described in the Braidwood Materiel Condition Improvement Strategy. The inspection identified some positive results from this initiative including a significant reduction in the threshold for identifying materiel condition issues and increased efforts to identify operator work-arounds. However, significant backlogs of action requests, maintenance work requests, engineering requests, and overdue preventive maintenance tasks still exist and are increasing in some instances. In addition, completion of scheduled work is being hampered by emergent work and rework. Collectively, these issues diminish your capability to respond to materiel condition concerns.

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PDR ADOCK 05000456  
Q PDR

Based on the results of this inspection, the NRC concluded that a violation of NRC requirements occurred as cited in the enclosed Notice of Violation (Notice). You are required to respond to this violation. The circumstances surrounding the violation are described in detail in the inspection report. This violation contains several examples of failure to follow procedures that could contribute to materiel condition weaknesses.

Prior to this inspection another example of a failure to follow procedures occurred and was documented in NRC Inspection Report Nos. 50-456/95017; 50-457/95017 as a non-cited violation. As part of your corrective actions, a reinforcement session was conducted emphasizing the need to adhere to procedural requirements. This was provided to the entire station on January 22, 1996. These corrective actions do not appear to have been effective. I encourage you and your current management team to continue focusing on the fundamental weaknesses underlying this problem.

During this inspection we also observed a possible weakness in the interaction between quality control inspections and the post maintenance verification process. We request that in your response you describe the actions you will take to ensure rework is properly characterized and post maintenance verifications are properly implemented, including any changes you deem necessary to quality control activities.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, with enclosures, and your response will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/s/ G. E. Grant

Geoffrey E. Grant, Director  
Division of Reactor Safety

Docket Nos. 50-456; 50-457  
License Nos. NPF-72; NPF-77

- Enclosures: 1. Notice of Violation
- 2. Inspection Reports
  - No. 50-456/96006(DRS);
  - No. 50-457/96006(DRS)

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DATE	04/ /96	04/ /96	04/ /96	04/17/96		

Based on the results of this inspection, the NRC concluded that a violation of NRC requirements occurred. You are required to respond to this violation. This violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. This violation contains several examples of failure to follow procedures that could contribute to the materiel condition weaknesses identified above.

Prior to this inspection another example of a failure to follow procedures had occurred and is documented in NRC Inspection Report Nos. 50-456/95017; 50-457/95017 as a non-cited violation. As part of your corrective actions, a reinforcement session was conducted emphasizing the need to adhere to procedural requirements. This was provided to the entire station on January 22, 1996. These corrective actions do not appear to have been effective. I encourage you and your current management team to continue focusing on the fundamental weaknesses underlying this concern.

During this inspection we also identified a concern regarding quality control inspections not identifying that post maintenance verifications were not conducted in accordance with station requirements. We request that in your response you describe the actions you will take to insure rework is properly characterized and post maintenance verifications are properly implemented.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, with enclosures, and your response will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Hubert J. Miller  
Regional Administrator

Docket Nos. 50-456; 50-457  
License Nos. NPF-72; NPF-77

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DATE	04/12/96		04/12/96		04/12/96		04/ /96		04/ /96	

K. Kaup

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April 17, 1996

cc w/encls: J. C. Brons, Vice President,  
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