

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station

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

During an NRC inspection conducted from February 5 through March 1, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality 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.

- a. BwAP 1250-2, Revision 3, "Problem Identification and Investigation Procedure," required, in part, that if a nonconforming problem was identified, however minor, a problem identification form (PIF) was to be initiated, to address the concern.

Contrary to the above, PIFs were not initiated on February 16 and 17, 1996, for identified problems encountered during replacement of condensate pump 1CD05PB 1B impeller, such as wrong impeller dimensions and a damaged motor bearing (50-456/96006-01a(DRS) - Section M2.1).

- b. BwAP 100-9, Revision 2, "Personnel Qualification Position Holders and Signature Alternates," designated specific individuals who had management signature authority.

Contrary to the above, as of February 28, 1996, numerous rework PIFs were signed by a maintenance individual as the "immediate supervisor" without having management signature authority (50-456/96006-01b(DRS), 50-457/96006-01b(DRS) - Section M3.3).

- c. BwAP 1400-2, Revision 7, "Predefine Parameter Change Procedure," required that form BwAP 1400-2T1 be completed when deferrals were made to the predefined fields in the Electronic Work Management System (EWMS) database. Form BwAP 1400-2T1, "EWMS Predefine Change Form," contained a section to be completed for PM deferrals including engineering evaluation/reason for allowing the PM task to pass its due date.

Contrary to the above, as of March 1, 1996, the licensee did not complete BwAP 1400-2T1 forms for all 400 overdue preventive maintenance (PM) tasks nor was the licensee able to provide engineering justification for the deferrals (50-456/96006-01c(DRS), 50-457/96006-01c(DRS) - Section E1).

- d. BwAP 1600-1, Revision 27E1, "Action/Work Request Processing Procedure," required, in part, that when maintenance work was completed in the field, deficiency tags were to be removed by the maintenance staff

during work package closeout. In addition, the system engineer was to ensure that deficiency tags were removed for cancelled Action or Work Requests.

Contrary to the above, during the week of February 12, 1996, several examples were identified where work had been either completed or cancelled, but the deficiency tags associated with the action requests (ARs) had not been removed. Examples include AR 950030458 (deficiency tag 157130), AR 950040324 (deficiency tag 185911), and AR 950034786 (deficiency tag 191442) (50-456/96006-01d(DRS), 50-457/96006-01d(DRS) - Section TP1).

This is a Severity Level IV violation (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 U.S. Nuclear Regulatory Commission, Region III, 801 Warrenville Road, Lisle, Illinois, 60532, and a copy to the NRC Resident Inspector at the Braidwood Station within 30 days of the date of the letter transmitting this Notice of Violation. 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. 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.

Dated at Lisle, Illinois, this
17th day of April 1996