## NOTICE OF VIOLATION

Commonwealth Edison Company Braidwood Station Docket Nos. 50-456; 50-457 License Nos. NPF-72; NPF-77

As a result of an inspection conducted from October 13 through November 30, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions." 10 CFR Part 2, Appendix C (1991), the violations are listed below.

A. Braidwood Technical Specification 6.11, "Radiation Protection Program," states: "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure."

Braidwood Radiation Protection Procedure 1110-3, "Radiological Postings, Labels, and Controls," details the requirements for proper posting and demarcation of radiologically controlled areas and the requirement that personnel shall read and comply with all radiological postings.

Contrary to the above:

- a. On July 15, 1992, a Radiation Protection Technician (RPT) removed the posting for the IA Letdown Heat Exchanger Room without adhering to the requirement to verify the room had been decontaminated.
- b. On July 29, 1992, a RPT failed to adhere to the posted requirements for whole body frisking prior to exiting a contaminated area.
- c. On October 16, 1992, two Mechanical Maintenance Department personnel entered the contaminated A.B. Hot Shop and failed to adhere to the posting requirements for protective clothing.

This is a Severity Level IV violation (Supplement IV) (50-456/92023-01(DRP); 50-457/92023-01(DRP)).

B. Braidwood Technical Specification 6.18, "Procedures and Programs," states: "Written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33."

Contrary to the above, on November 6, 1992, the Chemistry Department added sulfur hexafluoride to the Unit 1 condensate system without establishing a written procedure.

This is a Severity Level IV violation (Supplement I) (50-456/92023-02(DRP); 50-457/92023-02(DRP)).

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C. 10 CFR 50.59(b)(1), "Changes, Tests, and Experiments," requires that records of tests and experiments shall be maintained and that these records must include a written safety evaluation which provides the bases for the determination that the test or experiment does not involve an unreviewed safety question.

Contrary to the above, on November 6, 1992, the Chemistry Department added sulfur hexafluoride to the Unit 1 steam generators as an experiment without performing a safety evaluation to determine that the experiment did not involve a safety question.

This is a Severity Level IV violation (Supplement I) (50-456/92023-03(DRP); 50-457/92023-03(DRP)).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison 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, 799 Roosevelt Road, Glen Ellyn, Illinois, 60137, 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 Glen Ellyn, Illinois this <u>18</u> day of <u>December</u>, 1992

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Brent Clayton, Chief Reactor Projects Branch 1