



Commonwealth Edison  
Braidwood Nuclear Power Station  
Route #1, Box 84  
Braceville, Illinois 60407  
Telephone 615/458-2801

December 30, 1992  
BW/92-0640

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Dear Sir:

The enclosed Licensee Event Report from Braidwood Generating Station is being transmitted to you with the requirement of 10CFR50.73(a)(2)(i), which requires a 30-day written report.

This report is number 92-014-00, Docket No. 50-456.

K. L. Kofron  
Station Manager  
Braidwood Station

KLK/AJS/dla  
701ZD85G

Encl: Licensee Event Report No. 92-014-00

cc: NRC Region III Administrator  
NRC Resident Inspector  
INPO Record Center  
CECo Distribution List

310070

9212310189 921229  
FDR ADOCK 05000456  
S PDR

LEP  
11

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (RMMB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  
Braidwood 1

DOCKET NUMBER (2)  
05000456

PAGE (3)  
1 OF 4

TITLE (4)  
Inadequate Snubber Testing Program Due to Personnel Error

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
12	04	92	92	-- 014 --	00	12	29	92	Braidwood 2	05000457
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
POWER LEVEL (10)	099	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)		
		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)		
		20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER		
		20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)		
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)				
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)				

LICENSEE CONTACT FOR THIS LER (12)

NAME  
T. Johnson, Technical Staff X2245

TELEPHONE NUMBER (Include Area Code)  
(815) 458-2801

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (if yes, complete EXPECTED SUBMISSION DATE) X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On December 4, 1992, a program review was being conducted by the Snubber Testing Coordinator. It was found that contrary to Technical Specification 3.7.8, the specific population of snubbers installed on nonsafety-related systems whose failure or failure of the system on which they are installed would have an adverse effect on any safety-related system was not defined or included in the snubber testing program. The root cause of the event was a personnel error during the preservice period. The snubber coordinator at that time misinterpreted the Technical Specifications. Engineering has been requested to identify non-safety related snubbers whose failure could affect safety-related systems. These snubbers will be added to the inspection program, and visual examination and testing will begin during the next refueling outage. There have been no previous similar occurrences of inadequate snubber testing.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (HQB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	CCKET NUMBER (2)	LER NUMBER (6)		PAGE (3)	
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER
Braidwood 1	05000456	92	-- 014 --	00	2 OF 4

TEXT (if more space is required, use additional copies of NRC Form 366A) (17)

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: Braidwood 1; Event Date: December 4, 1992; Event Time: 0800  
 Mode: 1 - Power Operation; Rx Power: 99% RCS [AB]  
 Temperature/Pressure: NOT / NOP;

Unit: Braidwood 2; Event Date: December 4, 1992; Event Time: 0800  
 Mode: 1 - Power Operation; Rx Power: 100% RCS [AB]  
 Temperature/Pressure: NOT / NOP;

B. DESCRIPTION OF EVENT:

There was no equipment or systems inoperable at the beginning of the event that contributed to the severity of the event.

In accordance with Technical Specification 3.7.8, all snubbers shall be operable. The only snubbers excluded from this requirement are those snubbers installed on nonsafety-related systems whose failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

Prior to the initial plant startup, the Snubber Inspection program for Braidwood Units 1 and 2 was developed. At that time, Engineering was not requested to identify the non-safety related snubbers that could affect safety related systems.

On December 4, 1992, a program review was being conducted by the Snubber Testing Coordinator. It was found that contrary to the above requirement, the specific population of snubbers installed on nonsafety-related systems whose failure or failure of the system on which they are installed would have an adverse effect on any safety-related system was not defined or included in the snubber testing program.

There are no safety related snubbers in Category 2 structures. In order to insure that the Technical Specification requirements will be met, all snubbers in Category 1 safety related structures will be included in the inspection program. The program will be further modified based on the results of a review of snubber applications currently being conducted by Engineering. These snubbers have been inspected since commercial operation of the Units. Undocumented visual inspections were performed on the Main Steam and Feedwater System snubbers in conjunction with walkdowns for determining damage that could occur during transients associated with Unit Start-up and Shutdown. The non-safety related snubbers in the remaining Category 1 structures were documented as being visually examined by certified VT-3/4 inspectors as follows:

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MWRB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, ADD TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Braidwood 1	05000456	92	-- 014 --	00	3 OF 4

TEXT (if more space is required, use additional copies of NRC Form 366A) (17)

- Unit 1 Auxiliary Building - April 1989,
- Unit 1 Containment - April 1989,
- Unit 2 Auxiliary Building - February 1989,
- Unit 2 Containment - February 1989,
- Unit 2 Auxiliary Building - March 1990,
- Unit 2 Containment - March 1990

In addition, the accessible snubbers in both Units were examined in December, 1992.

Discussions with personnel previously responsible for the program, and a review of available documentation, establishes that 10% of the non-safety related snubbers in each unit have been hand stroked during each refueling outage. A portion of this population is located in category 1 structures. Although the snubbers have not been bench tested, they were proven not to be locked up or frozen.

A review of the operability status of the untested population of snubbers determined that the snubbers should be considered operable. Technical Specifications requires testing of only a random percentage of the snubbers involved. No specific snubbers are required to be tested. Thus, based on the visual inspections and hand stroking that occurred, there are no sound criteria for declaring any particular snubbers inoperable.

This discovery is being reported pursuant to 10CFR50.73(a)(2)(i)(B) - any operation or condition prohibited by the plant's Technical Specifications.

C. CAUSE OF THE EVENT:

The root cause of the event was a personnel error during the preservice period. The snubber coordinator at that time misinterpreted the Technical Specifications. Engineering was not requested to identify non-safety related snubbers that could adversely affect safety-related systems as required by the Technical Specifications.

D. SAFETY ANALYSIS:

This event had no effect on plant or public safety since the snubbers were visually examined and a percentage were stroked to prove they were not frozen nor locked-up.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (INBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0106), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)		PAGE (3)
Braidwood 1	05000456	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
		92	-- 014 --	00

TEXT (if more space is required, use additional copies of NRC form 366A) (17)

During the next Unit 2 refueling outage, A2R03, a minimum of 30% of those snubbers that Engineering identifies as non-safety related snubbers whose failure could affect safety-related systems will be tested. In the event of failures, sample population will be increased as required. This will be tracked to completion by action item 456-180-92-01402.

During the next Unit 1 refueling outage, A1R04, a minimum of 40% those snubbers that Engineering identifies as non-safety related snubbers whose failure could affect safety-related systems will be tested. In the event of failures, sample population will be increased as required. This will be tracked to completion by action item 456-180-92-01403.

For outages after A2R03 and A1R04, the snubbers involved will be considered part of the overall snubber population and will be tested as specified in Technical Specifications.

F. PREVIOUS OCCURRENCES:

There have been no previous similar occurrences of inadequate snubber testing.

G. COMPONENT FAILURE DATA:

This event was not the result of component failure, nor did any components fail as a result of this event.