

Commonwealth Edison Company
Braidwood Generating Station
Route #1, Box 84
Braceville, IL 60407-9619
Tel 815-458-2801



June 16, 1997

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

Subject: Reply to Notice of Violation
NRC Inspection Report 50-456(457)/97008
Braidwood Nuclear Power Station Units 1 and 2
NRC Docket Numbers 50-456 and 50-457

Reference: C.D. Pederson letter to H.G. Stanley dated May 19, 1997, transmitting
Notice of Violation from Inspection Report 50-456(457)/97008

The Reference letter contains a Notice of Violation (NOV) resulting from an inspection of our Radiation Protection Program which ended on April 30, 1997. During the inspection period, two violations were identified; however a response was required for only one of the issued violations. The attachment to this letter contains ComEd's response to this violation.

Braidwood Station has worked hard to effectively plan radiological work and ensure good radiation worker practices. These efforts resulted in the Station achieving a record low accumulated dose incurred during a Unit One refueling outage. We are encouraged by these results and will continue to look for ways to improve.

The following commitments were made in the attached response:

- BwRP 6210-17, "Use of Vacuum Cleaners and Fans in Radiologically Posted Areas," will be revised.
- Tailgates will be conducted with work groups who use vacuum cleaners in the Auxiliary Building to communicate the requirements of BwRP 6210-17.

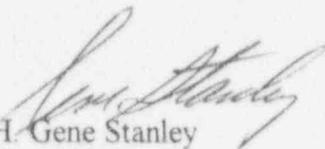
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If your staff has any questions or comments concerning this letter, please refer them to Terrence Simpkin, Braidwood Regulatory Assurance Supervisor, at (815) 458-2801, extension 2980.



H. Gene Stanley
Site Vice President
Braidwood Nuclear Generation Station

Attachment

cc: A.B. Beach, NRC Regional Administrator, Region III
G.F. Dick, Jr., Project Manager, NRR
C.J. Phillips, Senior Resident Inspector
F. Niziolek, Division of Engineering, Office of Nuclear Safety, IDNS

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ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION
VIOLATION (50-456(457)/97008-02)

Technical Specification 6.8.1.a requires that procedures be implemented for activities covered in Appendix A of Regulatory Guide 1.33.

Appendix A of Regulatory Guide 1.33 recommends that radiation protection procedures be implemented for contamination control.

Procedure BwRP 6210-17, "Use of Vacuum Cleaners and Fans in Radiologically Controlled Areas", Revision 2, requires, in part, that vacuums used in radiologically posted areas shall be controlled (i.e. locked) when needed beyond the end of the work shift and that openings on the suction line and hose ends be covered after each use to prevent the spread of contamination.

Contrary to the above, an inspector identified that:

- a. On April 23 - 29, 1997, vacuum cleaners used in radiologically posted areas on the 364' and 401' elevations of the Auxiliary Building and needed beyond the end of the work shift were not locked.
- b. On April 23 - 29, 1997, vacuum cleaners located on the 401' elevation of the Auxiliary Building did not have the suction line and hose ends covered after each use.

REASON FOR THE VIOLATION

BwRP 6210-17, "Use of Vacuum Cleaners and Fans in Radiologically Posted Areas," requires vacuums to be controlled by keeping them locked and also requires the openings on the suction line and hose ends to be covered to prevent the spread of contamination. Vacuum cleaners in the Auxiliary Building were not stored in accordance with these procedure requirements. Once this concern was identified, an investigation was conducted to evaluate the potential causes.

In one case, a vacuum cleaner was found unlocked at the boric acid mixing area on the 401' elevation. This vacuum was permanently issued to Operating for non-contaminated boric acid cleanup. Individuals who used this vacuum were unaware of the requirement to lock vacuums or keep them in a locked area in the radiologically posted area (RPA).

Another vacuum cleaner was found unlocked in the Unit One 364' steam generator blowdown condenser room. This was an extra vacuum cleaner obtained from a 346' storage cage. Since this vacuum was not issued from the 364' radiation protection

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zone, it is not known who used the vacuum and failed to follow the established storage requirements.

Similarly, for the case where a vacuum cleaner located on the 401' elevation of the Auxiliary Building did not have the ends covered, it is unclear what the hose had been used for and why the ends were left uncovered. Vacuum cleaners issued by Radiation Protection (RP) Technicians at that elevation are primarily used for vacuuming the IPM-8 monitors and general work.

Common causes for the above instances were determined to be the following:

1. An excessive number of vacuum cleaners are in the RPA making control more difficult.
2. The procedure was overly restrictive. The requirement to lock vacuum cleaners originated when Station Laborers controlled the vacuum program. Once the program was transferred to Radiation Protection, the need to control the vacuum cleaners by locking them was no longer necessary; however the procedure requirement was not updated to reflect this.
3. Not all station work groups who use the vacuum cleaners were aware of the storage requirements.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

After this problem was identified, the Station had verified that all vacuums in the Auxiliary Building were properly stored. In addition, excess vacuum cleaners have been removed from the general RPA.

ACTIONS TO BE TAKEN TO PREVENT RECURRENCE

Radiation Protection will maintain direct control over the vacuum cleaners stored in the Auxiliary Building.

BwRP 6210-17, "Use of Vacuum Cleaners and Fans in Radiologically Posted Areas," will be revised. The procedure revision will provide guidance on new storage requirements. Vacuums will be separated into two categories: clean (non-contaminated) RPA use or contaminated RPA use. Since the vacuum cleaners designated for clean areas will not be used in contaminated areas, the requirement to cover the hose ends and suction line openings will no longer be necessary. This storage requirement will remain for the vacuums designated for use in contaminated areas, however. In addition, the requirement to lock the vacuums or keep them in a locked area in the RPA will be removed.

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Tailgates will be conducted with work groups who use vacuum cleaners in the Auxiliary Building to communicate the requirements of BwRP 6210-17.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The procedure revisions and tailgates will be completed by July 15, 1997.