

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station
Braceville, Illinois

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

As a result of an inspection conducted from February 22 through April 7, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. Technical Specification 6.8.1.a states that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978, requires procedures for events that require emergency boration.

Contrary to the above, on March 25, 1997, the inspectors observed that 1BwFR-S.1, "Response to Nuclear Power Generation/ATWS Unit 1, Revision 1A, Step 4a, had not been maintained in that it directed operators to start the chemical and volume control system positive displacement charging pump if neither of the centrifugal charging pumps could be started. The positive displacement charging pump has been out-of-service and has not been run for about 10 years.

This is a Severity Level IV violation (Supplement I) (50-456/97005-01; 50-457/97005-01).

2. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," states, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, the inspectors identified a plant barrier between Fire Zones 11.3-0 and 11.4-0 at Auxiliary Building elevation 383, column N-18, that had been degraded since June 6, 1996. This barrier was needed to satisfy requirements stated in Deviation A.4 of the Fire Protection Report.

This is a Severity Level IV violation (Supplement I) (50-456/97005-02; 50-457/97005-02).

3. 10 CFR Part 50, Appendix B, Criterion XI, states in part, that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures.

Contrary to the above, the inspectors found that testing to measure Chemical Volume (CV) pump and Residual Heat Removal (RH) pump response times was preconditioned by the operation of the system immediately prior to response time measurement on the system. Additionally, no surveillance test existed that tested the startup of the CV pump as it would under accident conditions. All existing surveillances required first manually starting the charging pump auxiliary lube oil pump.

This is a Severity Level IV violation (Supplement I) (50-456/97005-03; 50-457/97005-03).

4. 10 CFR 50.59, paragraph (b)(1), states, in part, that the licensee shall maintain records of changes in the facility and ... these records must include a written safety evaluation which provides the bases for the determination that the change... does not involve an unreviewed safety question.

Contrary to the above, on February 25, 1997, the inspectors observed that the licensee had blocked open a doorway between the auxiliary building ventilation exhaust plenum and the auxiliary building which placed the auxiliary building ventilation system in an abnormal lineup and had not performed a 10 CFR 50.59 safety evaluation.

This is a Severity Level IV violation (Supplement I) (50-456/97005-04; 50-457/97005-04).

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 Regional Administrator, 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 (Notice). 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.

Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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.

Because your response will be placed in the NRC Public Document room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois
this 9th day of May, 1997