

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 the inspection conducted from August 9 through September 16, 1994, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (Enforcement Policy) the following violation was identified:

Technical Specification 6.8.1 required that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A, Regulatory Guide 1.33, Revision 2, February 1978, which includes preparations for refueling, procedure adherence, and radiation protection. Seven examples contrary to the above follow:

1. BwFP FH-31, "Fuel Handling Cleanliness Zones and Requirements," required personnel accountability be accomplished in a cleanliness zone II area by logging each individual in and out of the control point using the ingress, egress and equipment accountability form (BwFP FH-31T1).

Contrary to the above, on August 10, 1994, the licensee failed to log individuals in and out of a cleanliness zone II area control point using FH-31T1.

2. BwFP FH-31 required that a cleanliness zone II area be posted with a large, conspicuously placed sign having general instructions for entry.

Contrary to the above, on August 10, 1994, the licensee failed to post a cleanliness zone II area with an appropriate sign referencing the appropriate procedure with general instructions for entry.

3. BwFP FH-31 required that the entrance to a cleanliness zone II area include applicable procedure and accountability logs.

Contrary to the above, on August 10, 1994, the licensee failed to have the applicable procedure and logs in the area as required.

4. BwAP 100-20, "Procedure Use and Adherence," required that when an individual perceives that a procedure cannot be performed as written, that the individual inform supervision of the situation for evaluation. The supervisor will then evaluate the situation and determine the appropriate course of action.

Contrary to the above, on August 4, 1994, while securing the 2C condensate/condensate booster pump, nuclear station operators perceived that the governing procedure could not be performed as written, but nevertheless performed equipment manipulations outside the procedure without directly informing supervision and receiving guidance as required.

5. BwRP 5000-7, "Unescorted Access To and Conduct in Radiologically Posted Areas," required that personnel entering a radiologically posted area read and understand all radiological signs which appear at the access control point, and ensure that he or she has been issued a routine thermoluminescent detector (TLD) badge and at least one secondary dosimeter.

Contrary to the above, on August 30, 1994, two licensee employees who entered the radiologically protected area (RPA) failed to read and understand the radiological signs which appeared at the RPA control point, and failed to obtain secondary dosimetry as required.

6. BwAP 575 - 5, "Release of Material From a Radiological Posted Area" required that "solid material shall not be given an unconditional release (from the Radiation Protection Area) until the material has been decontaminated and determined to be free of detectable radioactive material".

Contrary to the above, on August 18, 1994, the licensee discovered an eddy current cover plate with 10,000 dpm/100 cm² smearable contamination on one bolt hole opening and 18,000 dpm/100 cm² smearable contamination on another bolt hole opening released outside the Radiation Protection Area without being decontaminated and free of detectable radioactive material.

Also contrary to the above, on August 30, 1994, the licensee discovered a reactor cavity decontamination paint container and a chair with 2,000 dpm/100 cm² smearable contamination released outside the Radiation Protection Area without being decontaminated and free of detectable radioactive material.

This is a Severity Level IV violation (Supplement I) (50-456/94021-01(DRP); 50-457/94021-01(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, 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 6th day of October, 1994