

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station Units 1 & 2

Docket Nos. 50-456; 50-457
Licenses No. NPF-72; NPF-77

As a result of an inspection conducted on June 18-24, 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 violation is listed below:

10 CFR 61.55(a)(8) requires, in part, that if the licensee determines the concentration of a radionuclide in wastes via indirect methods such as the use of scaling factors, the licensee provide reasonable assurance that the indirect method can be correlated with actual measurements.

Procedure BWRP 5600-6, "Scaling Factor Determination," revision 0, was prepared by the licensee to ensure that indirect methods, i.e. scaling factors, can be correlated with actual sample measurements.

Step F.2.c of procedure BWRP 5600-6 required that if any of the radionuclide scaling factors calculated for an individual waste stream sample differed from the current scaling factor by a factor of 10 or more, an additional sample of the waste stream be sent to an off-site laboratory for analysis.

Contrary to the above, the inspector identified that on August 12, 1994, March 28, 1995, and June 5, 1996, the licensee did not provide reasonable assurance that indirect methods could be correlated with action measurements. Specifically, the licensee did not re-sample waste streams which differed from current scaling factors by a factor of ten or greater.

This is a Severity Level IV violation (Supplement IV). (50-456/97011-01; 50-457/97011-01)

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 facility which is the subject of this Notice, 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 dockated 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 reuaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g. explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois
this 24th day of July 1997