



**Commonwealth Edison**

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August 22, 1988

Mr. A. Bert Davis  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

SUBJECT: Braidwood Station Units 1 & 2  
Response to Inspection Report Nos. 50-456/88-019  
& 50-457/88-019,  
NRC Docket Nos. 50-456 and 50-457

REFERENCE: (a) W. L. Forney Letter to C. Reed, dated July 22, 1988

Dear Mr. Davis:

This letter is in response to the inspection conducted by Messrs. T. M. Tongue, R. M. Lerch, J. M. Jacobson, T. E. Taylor, and G. A. Vansickle of Region III and S. P. Sands of NRR from May 29 through July 9, 1988 of activities at Braidwood Station. Reference (a) indicated that certain activities appeared to be in violation of NRC requirements. The Commonwealth Edison Company response to the Notice of Violation is provided in the enclosure.

Reference (a) also requested that Commonwealth Edison address the management decision-making process for determining what events are reportable under 10 CFR 50.72. This is included in the response to the Notice of Violation.

If you have any questions on this matter, please direct them to this office.

Very truly yours,

H. E. Bliss  
Nuclear Licensing Manager

/klj

cc: NRC Resident Inspector - Braidwood  
NRC Document Control Desk  
5029K

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COMMONWEALTH EDISON COMPANY  
RESPONSE TO INSPECTION REPORT 456/88-019 and 457/88-019

VIOLATION (457/88019-01)

10 CFR 50, Appendix B, Criterion V, requires that "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, on June 7, 1988, by 7:58 p.m., the licensee had failed to properly declare the initiation of an unusual event in accordance with Emergency Procedure BwZP 200-1, "Braidwood Emergency Action Levels." The declaration of an unusual event was required upon the initiation of a reactor shutdown required by Technical Specification (TS) 3.6.3 for an inoperable containment isolation valve. The unusual event was not declared until 9:40 p.m.

RESPONSE

Commonwealth Edison acknowledges that Braidwood Station failed to make a timely declaration of an unusual event in accordance with Emergency Procedure BwZP 200-1, "Braidwood Emergency Action Levels." However, Commonwealth Edison would like to present the circumstances that lead to this item occurring.

On June 7, 1988 at 6:00 p.m. the Shift Engineer (SE) at Braidwood Station was notified that the documentation necessary to demonstrate environmental qualification (EQ) for the containment isolation valve 2SI8809B motor operator could not be located. Valve 2SI8809B was declared administratively inoperable and the Limiting Condition for Operation Action Requirement (LCOAR) for Technical Specification (TS) 3.6.3 was entered for Unit 2.

While the search continued for the missing EQ documentation, station management reviewed the following to determine a subsequent course of action:

Technical Specification 3.6.3:

3.6.3 The containment isolation valves specified in Table 3.6-1 shall be OPERABLE with isolation times as shown in Table 3.6-1.

Applicability: Modes 1, 2, 3, and 4.

Action:

- a. With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within 4 hours:

1. Restore the inoperable valve(s) to OPERABLE status or,
2. Isolate each affected penetration by use of at least one deactivated automatic valve secured in the isolation position, or
3. Isolate each affected penetration by use of at least one closed manual valve or blind flange.

Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- b. The provisions of Specification 3.0.4 are not applicable provided that within 4 hours the affected penetration is isolated in accordance with ACTION a.2 or a.3 above, and provided that the associated system, if applicable, is declared inoperable and the appropriate ACTION statements for the system are taken.

- B. Braidwood Emergency/Implementing Procedure BWAP 200-1A1, Emergency Action Level (EAL) 14, entitled "Conditions or Systems Required by Technical Specifications," which states that an unusual event shall be declared when "equipment described in the Technical Specifications is degraded such that a Limiting Condition of Operation (LCO) requires a shutdown."
- C. A letter dated December 6, 1986 from Corporate Nuclear Station Division to all Station Managers, entitled "Generating Station Emergency Plan (GSEP) Declaration for EAL Condition 'Other Systems Required by Technical Specifications'" which states in part, "...the acceptable interpretation of this EAL is that the GSEP declaration must be made once the unit is required to immediately begin shutting down in order to meet the LCO time limit..."

After this review, station management determined that:

1. TS 3.6.3 actions a.2 and a.3 could be performed because either action would place Unit 2 in a condition of having cold leg injection capability in only two RCS loops which is not allowed by Technical Specifications.
2. The Technical Specification required shutdown did not need to be initiated until 10:00 p.m.

As a conservative action, station management decided to begin a power reduction on Unit 2 at 7:58 p.m., slightly more than 2 hours prior to being required by TS 3.6.3 to initiate a plant shutdown. The power reduction was completed and Unit 2 was placed in hot standby (Mode 3) at 9:39 p.m., still 21 minutes prior to being required to initiate a plant shutdown required by TS 3.6.3.

It was station management's position that the power reduction during the four hours allowed to restore operability to valve 2SI8809B did not constitute the plant shutdown required by TS 3.6.3. Station management's view, was that the actual Unit 2 shutdown at 9:39 p.m. became the entry condition for the unusual event for EAL #14. Since the declaration of the unusual event was made at 9:40 p.m., station management considered it timely.

However, upon further discussion with Edison Corporate PWR Division Management, well after the event, it was indicated that the more conservative and prudent course of action would have been to declare the unusual event at 7:58 p.m., when the power reduction began. Therefore, Commonwealth Edison acknowledges that Braidwood Station failed to make a timely declaration of an unusual event in accordance with Emergency Procedure BwZP 200-1, "Braidwood Emergency Action Levels."

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

After the discussions with Corporate PWR Division Management, a letter dated July 20, 1988 from the Production Superintendent to all operating shift supervisors was issued providing a further interpretation of the requirements of EAL #14. Additionally, this letter was included in the daily orders dated July 21, 1988.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION:

1. The Braidwood Station EAL's are being revised. The revised EAL's will be similar to those already in place at the LaSalle County and Zion Stations. The equivalent to the current EAL #14 will include additional clarification as to when an unusual event should be declared.
2. Discussions are ongoing between Braidwood Station, Corporate PWR Division Management and Corporate Emergency Planning to review development of guidelines on how similar events will be handled in the future. Any guidelines developed will be made available to appropriate station personnel.

DATE OF FULL COMPLIANCE:

1. The revised EAL's are expected to be issued for use by September 30, 1988.
2. Development and issuance of additional guidelines as deemed necessary are expected to be completed by December 31, 1988.

VIOLATION (457/88019-02)

10 CFR 50.72(b)(i)(A) requires a one-hour Emergency Notification System (ENS) notification for the initiation of any plant shutdown required by the plant's Technical Specifications.

Contrary to the above, on June 7, 1988, by 7:58 p.m., a Unit 2 plant shutdown had been initiated as required by TS 3.6.3, for which an ENS notification was not made within the one-hour time required. The notification was not made until 9:55 p.m.

RESPONSE:

As stated above in the response to Violation 457/88019-01, station management did not view the power reduction during the time available to restore valve 2SI8809B to an operable status as the entry condition for plant shutdown required by TS 3.6.3. Station management believed the Unit 2 shutdown at 9:39 p.m. had become the initiation point of the plant shutdown required by TS 3.6.3. The ENS notification was made at 9:55 p.m. and under this scenario station management believed compliance within the one hour reporting requirement had been made.

However, upon further discussion with Edison corporate PWR Division Management, well after the event, it was indicated that the more conservative and prudent course of action would have been to equate the power reduction begun at 7:58 p.m. with the initiation of a plant shutdown required by TS 3.6.3. Therefore, Commonwealth Edison acknowledges that Braidwood Station failed to make a timely notification (within 1 hour) to the NRC via ENS as required by 10 CFR 50.72 (b)(i)(A).

Upon review, Commonwealth Edison does not believe that as characterized this is a repeat violation. The events identified in NRC Inspection report 50-456/86-065 from which a comparison was made show that the ENS notification requirement was not recognized until after the appropriate notification time had been exceeded. At that time, appropriate corrective actions were implemented and remain effective. In the events which lead up to this violation, station management was fully aware of the ENS notification requirement and believed, at the time, that a timely (within 1 hour) notification had been made. Because of this Commonwealth Edison does not believe there is a commonality between the two items.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

After the discussions with Corporate PWR Division Management, a letter dated July 20, 1988 from the Production Superintendent to all operating shift supervisors was issued providing a further interpretation of the requirements of EAL #14. Additionally, this letter was included in the daily orders dated July 21, 1988.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION:

Discussions are ongoing between Braidwood Station, and Corporate PWR Division Management to review development of guidelines on how similar events will be handled in the future. Any guidelines developed will be made available to appropriate station personnel.

DATE OF FULL COMPLIANCE:

Development and issuance of any additional guidelines as deemed necessary are expected to be completed by December 31, 1988.

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