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DCP

September 2, 1988

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

SUBJECT: Braidwood Station Unit 1
Clarification of Response to Inspection Report No.
50-456/88-013
NRC Docket No. 50-456

REFERENCE: (a) W. L. Forney letter to C. Reed dated June 15, 1988
(b) H. E. Bliss letter to A. B. Davis dated July 15, 1988

Dear Mr. Davis:

During a conference call on July 29, 1988, held with Mr. W.L. Forney of your staff and Commonwealth Edison, it was determined that additional information was required to supplement reference (b). Enclosed is the response that provides that information and supports Edison's response to reference (a).

Should you or your staff have any questions please call this office.

H. E. Bliss
Nuclear Licensing Manager

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cc: NRC Resident Inspector - Braidwood
NRC Document Control Desk
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CLARIFICATION OF
COMMONWEALTH EDISON COMPANY
RESPONSE TO INSPECTION REPORT 456/88013

Braidwood entered the quarterly incore-excore calibration procedure with high expectations for success based on the MIDS cleaning performed in January, 1988 and adequate performance of the system in March, 1988. When sticking problems were encountered, recent precedence had indicated there was no apparent basis for considering them to be significant. Based on this previous experience, exercising the MIDS was expected to free up the sticking thimbles. Therefore, assuming that a timely resolution of the problem would be achieved, the surveillance conditions that had been entered (nominal 76% power) were maintained. At that time, Braidwood believed that this was an acceptable, conservative position, based on it's view of the Technical Specification and the situation at hand.

The following is a brief chronology of the moveable incore detection system (MIDS) thimble cleaning and the incore-excore calibration surveillance.

12/86	NUS cleaned and lubricated all 58 thimbles.
05/27/87	Unit 1 Initial Criticality achieved. No apparent problems with 58 thimbles operable.
10/30/87	Performed full core flux map. Used 52 thimbles. Thought to have drive problems. (In retrospect this was probably the beginning of the thimble sticking problems).
12/05/87	Additional 7 full core flux maps taken. Operable thimbles ranged from 52 to 55. Developed plan to clean thimbles during surveillance outage (16 thimbles identified that were in the most need of cleaning).
12/31/87	50 thimbles operable.
01/88	Cleaned the selected 16 thimbles.
03/20/88	Exercised MIDS at NOT/NOP. No thimble sticking problems encountered.
03/20/88	Unit 1 critical.
03/21/88	Unit 1 > 15% power.
03/23/88	Unit 1 shutdown.
04/24/88	Unit 1 critical following outage.
05/10/88	Surveillance conditions established at 75% power. Commenced quarterly incore-excore calibration surveillance.

Encountered sticking problems on numerous thimbles. As few as 39 thimbles operable.

Initiated comprehensive test/exercise program to free thimbles.

(Surveillance condition (nominal 76% power) maintained while pursuing MIDS problems. Management believed that, based on previous success with exercising the thimbles, the MIDS would be freed up in a timely manner and the surveillance procedure could be continued.)

- 05/13/88 System maintenance and troubleshooting began in parallel with MIDS exercise program.
- 05/23/88 NRC identifies concern relative to MIDS Surveillance.
- 05/24/88 Reactor power reduced to 74%.
- 05/27/88 Westinghouse installed and tested the Thimble Obstruction Removal System I. This system proved to be ineffective.
- 05/31/88 Technical Specification change requested to reduce percentage of incore detector thimbles from 75% to 65%.
- 06/02/88 May 31, 1988 Technical Specification change request not accepted by NRC. Submitted Technical Specification change request to extend the incore-excore calibration check monthly surveillance interval from 31 to 41 days.
- 06/02/88 NRR approved Technical Specification monthly surveillance interval change.
- 06/10/88 June 2, 1988 Technical Specification change request acceptance issued by NRC.
- 06/11/88 Unit 1 Shutdown.
- 06/13/88 Westinghouse installed and tested the Thimble Obstruction Removal System II. System effective in removing thimble blockage.
- 06/14/88 Unit 1 Critical.
- 06/15/88 Satisfactorily completed the monthly incore-excore calibration check surveillance.
- 06/28/88 Satisfactorily completed quarterly incore-excore calibration surveillance.

In reviewing this chronology in retrospect, the more prudent management action would have been to reduce power to less than 75% when the sticking problems had not been resolved after about 24 hours.

In reference (a), page 10, the NRC identifies plant management personnel as stating that they chose to stay above 75% power "...as an incentive to operating personnel to correct the MID problem..." It is Braidwood Station management's belief that this statement was taken out of context from a general discussion on "philosophy" of plant operations between operations management and the Senior Resident inspector. It is Braidwood Station's policy that plant operations be within the boundaries specified in the Technical Specifications and be in adherence to procedures and operating orders.

Pending implementation of the corrective actions committed to in Reference (b), Braidwood will, in a similar situation, reduce power or otherwise place the unit in a mode or condition for which the specification does not apply.

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