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May 12, 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 2
Response to Inspection Report No. 50-457/88012
NRC Docket No. 50-457

REFERENCE: (a) E. G. Greenman letter to C. Reed dated April 15, 1988

Dear Mr. Davis:

This letter is in response to the inspection conducted by Messrs. T. M. Tongue and T. E. Taylor on March 14 through 25, 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 as Enclosure 1. Additionally, Reference (a) requested that we address the topics of communications and control of locked equipment. This is included as Enclosure 2.

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

Very truly yours,

H. E. Bliss
Nuclear Licensing Manager

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encl.

cc: NRC Resident Inspection - Braidwood
NRC Document Control Desk

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Enclosure 1

Commonwealth Edison Company
Response To Inspection Report 457/88012

Violation: (457/88012-01)

Technical Specification 3.5.2, "ECCS SUBSYSTEMS - Tavg $\geq$ 350°F," states: "Two independent Emergency Core Cooling System (ECCS) subsystems shall be OPERABLE with each subsystem comprised of:

a. One OPERABLE centrifugal charging pump,
b. One OPERABLE Safety Injection pump,
c. One OPERABLE RHR heat exchanger,
d. One OPERABLE RHR pump, and
e. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a Safety Injection signal and automatic opening of the containment sump suction valves.

This specification is applicable in Modes 1, 2, and 3, and the action required with one ECCS subsystem inoperable is to restore the inoperable subsystem to operable status within seven days or be in at least Hot Standby (Mode 3) within the next six hours and in Hot Shutdown (Mode 4) within the following six hours.

Contrary to the above, while in Modes 2 and 3 the 2B Safety Injection pump was made inoperable by the inadvertent shutting and locking of the manual discharge valve (2SI8921B) between 7:47 p.m. on March 5, 1988, and 5:00 p.m. on March 13, 1988 (a period of over 7 days and 21 hours). The shut discharge valve rendered the 2B ECCS train inoperable (incapable of performing its intended function) during that time.

Response:

Commonwealth Edison acknowledges that the 2B ECCS train was inoperable for the identified period.

Corrective Actions Taken And Results Achieved:

Upon identification the 2SI8921B valve was immediately restored to its normal locked open position.

The individuals involved have participated in a review of this event with senior operating management. Appropriate disciplinary action commensurate with their performance has been accomplished.

Corrective Action Taken To Avoid Further Violation:

Guidance on the proper use of the component abnormal position log has been provided to and reviewed with operating shift personnel.

Senior operating management has reviewed this event with each operating shift. Proper communication, including repeat back, was stressed.

The Licensee Event Report (457-88-001) associated with this event will be included in both the licensed and non-licensed operator required reading.

Date of Full Compliance:

Inclusion of the License Event Report in required reading package 88-03 is expected to be completed by June 30, 1988.

Enclosure 2

Reference (a) requested that we address, separate from the response to the Notice of Violation, personal communications, control of locked equipment and related training in these areas.

Subsequent to the March 13, 1988 event which resulted in the referenced violation, the Assistant Superintendent of Operations has spent significant time reviewing the Station's philosophy, policy and practices with respect to the issuance, receipt, execution and report back on orders directing operations activities. This review identified the need for definitive guidance on the quality and formality of communications to and from the control room. The Assistant Superintendent of Operations is developing a Special Operating Order in accordance with procedure BwAP 350-3 "Special Operating Orders". This Order will provide guidance on what is expected in the transmission, receipt and feedback of control room communications of a directive nature. The Special Operating Order is expected to be issued by the end of May 1988.

The Training Department in conjunction with the Operating Department is developing a training program on communications. This program will stress good communication techniques for both speaking and listening and focus on their application to the control room environment. Both licensed and non-licensed operators are expected to receive a version of this communications training program during the upcoming requalification cycle which begins in June and ends in December 1988.

Administrative controls governing the use of locks on equipment requiring locks is provided in procedure BwAP 330-3 "Locked Equipment Program". The Assistant Superintendent of Operations reviewed the implementation of this program. The overall program was found to be sound and effective. Minor confusion was identified as to the applicability of the use of the Component Abnormal Position Log in relation to the removal of a locking device while not actually repositioning the component (this was a contributing cause to the referenced violation). It has been clarified to each shift that removal of a locking device from a component is by definition altering the position of that component and must be logged.

Training on BwAP 330-3 is provided to non-licensed operators in their initial training program and again during each requalification cycle.

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