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DCS

October 6, 1988

Mr. James Lieberman, Director
Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC. 20555

Attn: Document Control Desk

Subject: Braidwood Station Unit 1
Proposed Imposition of Civil Penalty
Inspection Report No. 50-456/88-007
NRC Docket No. 50-456

Reference: (a) June 20, 1988 L.O. DelGeorge letter to J. Lieberman
(b) September 7, 1988 J. Lieberman letter
to J.J. O'Connor

Dear Mr. Lieberman:

Reference (a) provided the NRC with Commonwealth Edison's response to the subject Notice of Violation (NOV) and Proposed Imposition of Civil Penalty. In reference (a) and as acknowledged in reference (b), Commonwealth Edison, in part, took exception to Violation B stating that the preoperational testing performed on March 4 and 11, 1987 could not have detected the logic switch wiring problem because the implementing design change had not been completed until a number of weeks after that testing. In reference (b), the NRC staff agreed that the testing on the dates stated would not have detected the problem. In reference (a), Commonwealth Edison admitted that the testing that was performed (Functional Test) subsequent to the completion of the design change was not adequate to detect the problem. Also in reference (a), Commonwealth Edison agreed with the Notice of Violation (NOV) and Proposed Civil Penalty transmittal letter characterization of the event as a degraded system (rather than an inoperable system, as stated in Violation B). Based on the Commonwealth Edison response, reference (b) provided a modification of Violation B that now reads as follows:

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"Contrary to the above, the licensee's test program did not demonstrate that the Control Room Ventilation Systems (CRVS) would perform satisfactorily in that CRVS pre-operational testing, which was completed before the CRVS were declared operable at the time of Unit 1 initial criticality on May 29, 1987, did not identify that heater interlock logic switches were wired incorrectly, that specified switch setpoints had not been adjusted, and that CRVS were in degraded condition."

The purpose of this letter is to provide the NRC staff with information that clarifies the amount of degradation of the VC system that occurred as a result of the incorrect wiring of the heater interlock logic switches. For the review and use of the NRC staff, Commonwealth Edison is providing the following information regarding the pre-operational testing of the Control Room Ventilation (VC) system.

Pre-operational test BWPT-VC-10 (completed on March 11, 1987) and subsequent retests #146 (flow verification test, completed on March 30, 1987), #147 (radiation monitor interlock check, completed on 4/4/87), #148 (manual isolation capability test, completed on 5/3/87) and #149 (flow verification test, completed on 5/9/88) were established and performed to demonstrate the operability of the VC system by verifying compliance with the following criteria:

- that the system will properly respond to high radiation, emergency safety feature, and ionization signals;
- that each system train is capable of delivering a total supply air flowrate of 49,500 cubic feet per minute (cfm) \pm 10% and make-up flowrate of 6,000 cfm \pm 10% in all modes of operation;
- that the VC system maintains the upper cable spreading room at a minimum positive pressure of 0.02 inches water gauge and all other control room areas at a minimum positive pressure of 0.125 inches water gauge with respect to surrounding areas;
- that manual isolation capability of the VC system is achievable.

This pre-operational testing was performed per the above and each of these criteria was satisfactorily met. Although the errors presented in the NOV and addressed in our response prevented the heater from performing as intended, the capability of the VC system to meet the above criteria was not impaired. The VC system was still capable of performing in accordance with this criteria. As discussed in Attachment C to reference (a) with the heater inoperable, the VC system would still have been capable of limiting the maximum control room dose to the thyroid to less than 30 rem as established by 10CFR50 Appendix A, Criteria 19 of Group II.

This is being provided for the NRC staff's use in conjunction with your review of reference (a). Please direct any questions concerning this matter to this office. As discussed in a telephone call made to H. Wong of your staff by S. Hunsader of my staff, submittal of this response was extended until October 6, 1988.

Very truly yours,



L.O. DelGeorge
Assistant Vice President

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cc: A.B. Davis (RIII)
S. Sands (NRR)
NRC Resident Inspector-Eraidwood
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