



Commonwealth Edison
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DCD

May 26, 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 and 2
 Response to Inspection Reports Nos.
 50-456/88-008 and 50-457/88-009
NRC Docket Nos. 50-456 and 50-457

Reference (a): W. L. Forney letter to C. Reed
 dated April 26, 1988

Dear Mr. Davis:

This letter is in response to the inspection conducted by Messrs. T. M. Tongue, T. E. Taylor, T. Tella, A. Dunlop, Jr., P. Kaufman, W. Grant, R. Sutphin and J. M. Ulie on February 14 through April 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.

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

Very truly yours,

for F. M. Lentini
 H. E. Bliss
 Nuclear Licensing Manager

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Enclosure

cc: NRC Resident Inspector - Braidwood
 NRC Document Control Desk

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

RESPONSE TO INSPECTION REPORT

NOS. 456/88008; 457/88009

VIOLATION: (456/88008-01; 457/88009-01)

10 CFR 50 Appendix B, Criterion II, requires that the Quality Assurance (QA) program provide for the indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.

Contrary to the above, during performance of startup test RP-70, "Reactor Protection Logic," and surveillance 2BWOS 3.2.1.1.a-2, Nuclear Station Operators were observed using measuring and test equipment (M&TE), for which they do not receive any documented training, on safety-related circuits. During the 2BWOS 2.3.1.1.a-2 test, misuse of the M&TE resulted in unplanned ESF actuations (two auto starts of the 2A auxiliary feed pump).

RESPONSE

Commonwealth Edison Company acknowledges that Nuclear Station Operators (NSOs) used M&TE for which there was no documented training. The NSO misused the M&TE twice while performing Surveillance 2BWOS 3.2.1-941 (rather than 2BWOS 3.2.1.1.a-2 as is stated in the Notice of Violation). This led to inadvertent starts of the 2A Auxiliary Feedwater (AF) Pump.

This event had no affect on plant or public safety as the Unit was in mode 4 with the Residual Heat Removal System available.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Upon initiation of the auto-starts for the AF pump the surveillance procedure was exited and the pump was restored to its initial condition.

In order to assure that the surveillance procedure was correctly written it was reperformed twice without an auto-start of the AF pump. Both times the M&TE was used correctly.

CORRECTIVE ACTION TO AVOID FURTHER VIOLATION

A description of this event along with details on the operation of a voltmeter have been included in tailgate sessions with appropriate operating personnel. Additionally the individual involved in this event will be trained on the proper use of the Volt-Ohm meter.

The operation of the Volt-Ohm meter has been included in the initial non-licensed operator training and in the licensed operator's training matrix.

Also, in August 1988 Westinghouse Corporation will be conducting site Specific Solid State Protection system training for all licensed operators. This training will use a simulator of a solid state protection panel and will specifically cover this event.

DATE OF FULL COMPLIANCE

Full compliance is expected to be achieved by August 31, 1988.

VIOLATION: (456/88008-02; 457/88009-02)

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

Contrary to the above, on several occasions, operations personnel failed to make appropriate log entries in the control room logs, in the manner prescribed by BWAP 350-1, "Operating Logs and Records." The deficient areas noted were completeness of log entries, equipment status changes, and log entry legibility.

RESPONSE

Commonwealth Edison acknowledges that on several occasions log entries made by operations personnel were substandard. The identified deficiencies included completeness of log entries and inadequate entries regarding equipment status changes. Also, in some cases penmanship was difficult to read which made entries subject to interpretation.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

On February 24, 1988 the Assistant Superintendent for Operations issued a memo to the shift operating personnel directing them to maintain Braidwood standards and pay closer attention to detail when making log entries. Also, during weekly operating shift supervisor meetings the Assistant Superintendent for Operations, emphasized the need for supervisors to upgrade their review standards and not tolerate mediocre log entries.

Recent reviews of logs by Senior Operating Management have indicated a noticeable improvement in the log entries.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

Braidwood Operating Department Memoranda document Operating Department policy and serve as guidance to Department personnel. Memorandum 2-28 was issued on April 22, 1988. This memorandum reviews the concerns that had been raised on the several occasions cited. It further discusses the purpose and intent of logs with an emphasis on the type and quality of log entries.

DATE OF FULL COMPLIANCE

Full compliance has been achieved.