

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station
Braceville, Illinois

Docket Nos. 50-456; 50-457
License Nos. NPF-72; NPF-77

As a result of an inspection conducted from September 23 through November 3, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. 10 CFR 50.72(b)(2)(ii) states a four-hour non-emergency notification to the NRC is required when the following occurs:
 - (ii) Any event or condition that results in a manual or automatic actuation of any engineered safety feature (ESF), including the reactor protection system, except when:
 - (A) The actuation results from and is part of a pre-planned sequence during testing or reactor operation;
 - (B) The actuation is invalid and;
 - (1) Occurs while the system is properly removed from service;
 - (2) Occurs after the safety function has been already completed; or
 - (3) Involves only the following specific ESFs or their equivalent systems;
 - (i) Reactor water clean-up system;
 - (ii) Control room emergency ventilation system;
 - (iii) Reactor building ventilation system;
 - (iv) Fuel building ventilation system; or
 - (v) Auxiliary building ventilation system.

Contrary to the above, on October 14, 1997, a licensee instrument technician made an error when changing setpoints on the Unit 2 containment area radiation monitor 2AR11J. The error resulted in a false high radiation alarm and a Unit 2 "A" train containment ventilation isolation. The licensee failed to make a notification to the NRC within 4 hours as required by 10 CFR 50.72 for the ESF actuation involving the containment ventilation isolation.

This is a Severity Level IV violation (Supplement I) (50-457/97016-01(DRP)).

2. Technical Specification (TS) 6.8.1.a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, Appendix A, Section 9.e, states, general procedures for the control of maintenance, repair, replacement, and modification work should be prepared before reactor operation is begun.

Braidwood maintenance procedure (BwMP) 3300-018, "Application of Liquid Nitrogen Freeze Seal to all Piping," Revision 5E1, Step F.4.a, requires a maintenance supervisor to obtain shift supervisory permission to start the freeze. Step F.4.e requires a supervisory signature for the evaluation of freeze plug integrity. Step F.4.f.1 requires the recording of temperature readings every ten minutes on a freeze seal log (Attachment 2 to the procedure). Step F.4.f.2 requires that frequent oxygen readings be obtained at the work location and near the floor. Step F.4.g requires an individual to acknowledge the completion of steps F.4.a through F.4.g by providing their initials. Step F.5.a requires a supervisory signature for the proper maintenance of the freeze seal.

Contrary to the above, as of October 1, 1997, contractor personnel did not make the above required signatures prior to mechanics breaching the essential service water system, did not utilize Attachment 2 of the procedure to record required temperature readings, and did not obtain required oxygen readings.

This is a Severity Level IV violation (Supplement I) (50-457/97016-02(DRP)).

3. 10 CFR Part 50, Appendix B, Criterion V, states, in part, activities affecting quality shall be prescribed by documented instructions, procedures, and drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

BwMP 3300-025, "Erection, Inspection, Use, and Dismantling of Scaffolding, Ladders and Temporary Barriers," Revision 3, Step 1.c.1, Scaffold Request Form (BwMP 3300-025A1), required the shift manager/designee to review the scaffold for impact on plant operations and equipment and to note any concerns or special instructions. Step E.13 of BwMP 3300-025A2 requires that all scaffolds erected in seismic areas have a scaffold request form (BwMP 3300-025A1) posted on the scaffold prior to placing the scaffold in use. The scaffold request form documents that the scaffold was built and inspected to seismic standards. Additionally, Step F.7 of BwMP 3300-025A2 requires all seismic scaffolds to be logged in the scaffold tracking program.

Contrary to the above, on August 25, 1997, scaffolding was erected in a seismic area next to the Unit 2 containment spray additive tank (2CS01T) and was missing the scaffold request form certifying that it met the seismic requirements. On August 28, 1997, three scaffolds had been erected in the 1A/C diesel oil storage tank room over the 1A diesel oil storage tank transfer pump and next to the diesel oil storage tanks, all designated as seismic areas, without the required BwMP 3300-025A1 form and without being logged into the scaffold tracking program. On September 8, 1997, scaffolding was erected in the Unit 2 main steam pipe tunnel, a designated seismic area, without the required BwMP 3300-025A1 form, and the scaffolding was not logged into the tracking program. On September 16, 1997, scaffolding was erected in the auxiliary building over the 2B containment chiller, a designated seismic area, without the required BwMP 3300-025A1 form attached.

This is a Severity Level IV violation (Supplement I) (50-456/97016-03(DRP); 50-457/97016-03(DRP)).

4. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions," states, in part, that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, defective material and equipment, and nonconformances, are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action is taken to preclude repetition."

NRC violation 50-456/96021-01f(DRP); 50-457/96021-01f(DRP) was issued on February 18, 1997, to document a violation of station procedures and policies in that the licensee did not control unattended rolling carts and equipment in safety-related areas to prevent damage to safety-related equipment during a seismic event. In response to the violation, and in order to prevent recurring rolling cart deficiencies, the licensee implemented corrective actions, including issuing written instructions in Braidwood Policy Memo #65, removing rolling carts from the auxiliary building, painting carts remaining in the Auxiliary Building, and attaching brakes or anchoring devices to carts remaining in the Auxiliary Building.

Procedure BwAP 100-10, "Conduct of Station Personnel," Step C.4.d, states, in part, that unattended rolling carts need to be secured so that during a seismic event they will not roll into a safety-related component.

Contrary to the above, between September 15 and October 22, numerous rolling carts were identified in close proximity to safety-related equipment without adequate controls to prevent damage to the safety-related equipment during a seismic event. Rolling carts were found close to 1RT-AR012, fuel handling building incident monitor; 1RT-AR014, containment and auxiliary building radiation monitor; ESF [Engineered Safety Feature] Bus 241, cubicle 21, SX [essential service water] pump 2A breaker; 2SX01PA, 2A essential service water pump motor; and other safety-related components. Corrective actions taken in response to NRC violation 50-456/96021-01f(DRP); 50-457/96021-01f(DRP) were not effective in precluding repetition of rolling cart and equipment interference problems.

This is a Severity Level IV violation (Supplement I) (50-456/97016-04(DRP); 50-457/97016-04(DRP)).

5. TS 6.1.1 states, in part, that procedures for personnel protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Braidwood radiological procedure BwRP 5010-1, "Radiological Posting and Labeling Requirements", Revision 7, Step G.3.c, states, that if an area exists which is accessible to individuals and for which radiation levels could exceed 5 millirem in any 1 hour at 30 centimeters from the source then post "CAUTION, RADIATION AREA" signs at any entrance to the area.

Contrary to the above, on September 26, 1997, the inspectors identified an area in the auxiliary building, adjacent to the Unit 2A containment spray pump room on elevation 346 that was indicating 12 millirem per hour at 30 centimeters from the source and was not posted as a radiation area.

This is a Severity Level IV violation (Supplement I) (50-457/97016-06(DRP)).

6. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions," states, in part, that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, defective material and equipment, and nonconformances, are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action is taken to preclude repetition."

NRC violation 50-456/97007-03c(DRP); 50-457/97007-03c(DRP) was issued on June 17, 1997, to document a violation of station procedures in that the licensee did not control unattended combustible materials in safety-related areas. In response to the violation, the licensee implemented corrective actions, including publishing articles about controlling combustible materials in the daily station newsletter, making presentations to first line supervisors to heighten awareness of fire protection issues, and committing to routinely monitor the plant during outage periods.

Procedures BwAP 1100-10, "Control and Use of Flammable and Combustible Liquids and Aerosols," and BwAP 1100-11, "Fire Prevention for Use of Lumber and Other Combustibles," list the requirements for use of combustible materials in safety-related areas of the plant. These requirements include use of approved storage containers for flammable and combustible liquids in safety-related structures and use of transient fire load permits for combustible materials that must be left unattended in safety-related structures.

Contrary to the above, between September 16 and October 20, combustible fluids and materials were not adequately controlled in the auxiliary building. Some items identified in non-approved safety containers included a 1-gallon glass jar of kerosene, a 1-gallon plastic jug of mineral spirits, and a 1-gallon can of denatured alcohol. There were also two high efficiency particulate air filters that were specifically designated by licensee procedures as a major combustible stored in the auxiliary building. All items were discovered unattended and without transient fire load permits.

This is a Severity Level IV violation (Supplement I) (50-456/97016-07(DRP); 50-457/97016-07(DRP)).

Pursuant to the provisions of 10 CFR 2.201, Commonwealth Edison is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region III, 801 Warrenville Road, Lisle, Illinois, 60532, and a copy to the NRC Resident Inspectors at the Braidwood Station within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the

violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document room, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois
this 17th day of December, 1997