

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station

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

As a result of an inspection conducted from August 12 through September 22, 1997, two 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 Part 50, Appendix B, Criterion XVI, states in part, measures shall be established to assure that conditions adverse to quality 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 taken to preclude repetition.

Contrary to the above, on August 14, 1997, licensee personnel verified the position of the 2B containment spray duct drain valve (2CS012B) without removing and reinstalling the locking device as required by BwAP 34C-2, "Use Of Mechanical And Electrical Lineups," Revision 15E1, Step C.3.c.8. On August 20, 1997, the licensee found 2CS012B closed as required, but unlocked. BwOP CS-M2, "Operating Mechanical Lineup Unit 2," Revision 3, required that 2CS012B be locked closed. The proper positioning of plant components has been a recurring issue. Training of operators on valve position verification was performed in 1996 as part of corrective actions for this problem; however, these corrective actions to preclude repetition have not been fully effective.

This is a Severity Level IV violation (Supplement I) (50-456/97015-01(DRP)).

2. Technical Specification 6.8.1.a states that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978. Recommended procedures listed in Regulatory Guide 1.33, Appendix A, include general procedures for the control of maintenance, repair and modification work.

BwAP 2320-21, "Exempt changes," Revision 0, specifies criteria for making exempt changes, which are defined as changes which have low potential to significantly reduce the margin of nuclear safety and require minimal engineering input. BwAP 2320-21 further specifies a listing of the testing requirements and the test acceptance criteria (Section E.3).

BwAP 1610-5, "Development of Modification Tests," Revision 3, prescribes the requirements applicable to modification tests and provides guidelines for their development, which includes having tests that demonstrate that the modified components/systems are as designed and the interrelation with other components and/or systems was not adversely affected. BwAP 1610-5 further specifies that testing procedures will be developed, a 10 CFR 50.59 screening and/or safety evaluation shall be prepared, and the acceptance criteria section of the post modification test shall identify the criteria which, if satisfied, shall ensure that the test objectives are accomplished.

Contrary to the above, on October 3, 1996, a modification installed on the Unit 1 engineered safety feature (ESF) switchgear room ventilation system was found to have been tested without an approved post modification test procedure. Additionally, on October 25, 1996, post modification testing of the miscellaneous electrical equipment ventilation system was also performed without an approved post modification test procedure. In the case of the ESF switchgear room ventilation system, the lack of an approved procedure to assure that the test objectives were accomplished resulted in a failure to identify that a set of electrical relay contacts were improperly installed and that the system was not operating as designed.

This is a Severity Level IV violation (Supplement I) (50-456/97015-03(DRP)).

Regarding Item 1, 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 Inspector 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.

Regarding Item 2, the inspection showed that actions had been taken to correct the identified violation and prevent recurrence. Consequently, no reply to Item 2 is required and we have no further questions regarding this matter. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, proceed as with Item 1 above.

Because your response will be placed in the NRC Public Document Room (PDR), 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 26th day of November, 1997