

NOTICE OF VIOLATION

Commonwealth Edison Company
Braidwood Station Unit 2

Docket No. 50-457
License No. NPF-77

As a result of an inspection conducted on November 12-21, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violation is listed below.

1. 10 CFR 50, Appendix B, Criterion V requires in part that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances.

Contrary to the above, as of November 10, 1997, the procedure which was used to fill and vent the 2D feedwater system, an activity affecting quality, as prescribed by BwOP FW-3, "Fill and Vent of the Feedwater System," Revision 6, was inappropriate for the circumstances. Sections of feedwater piping between the Feedwater Shutoff Valve (2FW006D) and the Feedwater Isolation Valve (2FW009D) were not adequately vented, and as a result, safety-related components were damaged by the feedwater system waterhammer event that occurred on November 10, 1997.

This is a Severity Level IV violation (Supplement I) (457/97021-01(DRS)).

2. 10 CFR 50, Appendix B, Criterion V requires in part that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

- a. Braidwood Procedure, BwAP 100-20 "Procedure Use and Adherence," Revision 7E1, paragraph D.9 required, in part, that when an individual perceives that any procedure cannot be performed as written, the individual's supervisor is required to initiate a permanent or temporary change, or use Braidwood Procedure, BwAP 100-20T1 to document any deviations from a procedure.

Contrary to the above, on November 10, 1997, when the Procedure 2BwGP 100-2, "Plant Startup," Revision 9, could not be performed as written, the licensee failed to follow BwAP 100-20 to issue a procedure revision or change. Specifically, step F.14.h of this procedure caused valves 2FW035A-D to close and instructions had not been provided to reopen these valves. The operators took manual actions, not described in the procedure nor documented in an approved procedure change process, to open these valves and restore feedwater flow.

This is a Severity Level IV violation (Supplement I) (457/97021-02(DRS)).

- b. Braidwood Procedure, BwAP 330-10 "Operability Determinations," Revision 3E1, paragraph F.5, required "Any on-site personnel knowledgeable of a possible OPERABILITY ISSUE, identified to them by any source, MUST promptly notify the Shift Manager (SM), or designee and write a PIF". Also the Commonwealth Edison Procedure, NSWF A-15, "ComEd Nuclear Division Integrated Reporting Program," Revision 1, paragraph 6.1.1 required "All station individuals or

contractors should initiate an Exhibit A, (Problem Identification Form(PIF)), when a problem is recognized."

Contrary to the above:

- (1) On November 10, 1997, the licensee had failed to follow NSWP-A-15 and BwAP 330-10 requirements to issue a PIF for the tempering line snubber considered inoperable. Specifically, the 2D feedwater tempering line snubber had been determined to be inoperable (based on station operator log entries) and a PIF had not been issued to document the inoperable status of this equipment.
- (2) On November 10, 1997, the licensee failed to follow NSWP-A-15 and BwAP 330-10 requirements to issue a PIF when a problem was recognized/identified on steam generator 2D main feedwater line snubbers (2FW05011S, 2FW05013S, & 2FW05022S). Specifically, problems with these snubbers had been recognized/identified in action requests (970084651, 970084666, 970084667) on November 10, 1997, and corrected prior to documenting the problem in PIF A1997-5074 "Snubbers 2FW05011S, 2FW05013S, & 2FW05022S Suspect," on November 13, 1997.

This is a Severity Level IV violation (Supplement i) (457/97021-03(DRS)).

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, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, 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 or severity level, (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.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois
the 11th day of February 1998