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**ComEd**

August 22, 1997

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Reply to Notice of Violation  
NRC Inspection Report 50-456(457)/97011  
Braidwood Nuclear Power Station Units 1 and 2  
NRC Docket Numbers 50-456 and 50-457

Reference J. A. Grobe letter to H. G. Stanley dated July 24, 1997, transmitting  
Notice of Violation from Inspection Report 50-456(457)/97011

The inspection report specified in the Reference above includes results from an inspection of Braidwood's solid radioactive waste processing and shipping program which ended on June 24, 1997. A Notice of Violation was transmitted with the referenced report and included one Severity Level IV Violation associated with procedure adherence. The attachment to this letter contains ComEd's response to this violation.

Station Management has continued to emphasize the importance of procedure adherence during Human Performance sessions. Two Human Performance sessions were conducted in 1997 and two additional sessions are scheduled to take place later in the year. In addition, a trending program on procedure adherence events has been established with classification on type of adherence issue. A team has been established at Braidwood to review a selected number of administrative procedures to determine if the instructions need to be clarified or if increased training is needed. The goal of this team is to improve administrative procedure compliance by clarifying the requirements to plant personnel. These actions are being taken to improve both the awareness of procedure adherence requirements and improve Station performance.

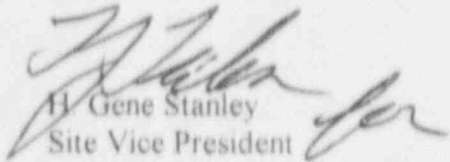
The following commitment was made in the attached response:

- BWRP 5600-6, "Scaling Factor Determination," is being reviewed and revisions will be made as necessary. In addition, the Station plans to enhance the procedure by adding an additional signature block for a secondary reviewer.

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If your staff has any questions or comments concerning this letter, please refer them to Terrence Simpkin, Braidwood Regulatory Assurance Supervisor, at (815) 458-2801, extension 2980.

  
H. Gene Stanley  
Site Vice President  
Braidwood Nuclear Generating Station

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Attachment

cc A B. Beach, NRC Regional Administrator, Region III  
G F. Dick, Jr., Project Manager, NRR  
C J. Phillips, Senior Resident Inspector  
F. Niziolek, Division of Engineering, Office of Nuclear Safety, IDNS

## ATTACHMENT I

### REPLY TO NOTICE OF VIOLATION

\* VIOLATION (50-456(457)/97011-01)

10 CFR 61.55(a)(8) requires, in part, that if the licensee determines the concentration of a radionuclide in wastes via indirect methods such as the use of scaling factors, the licensee provide reasonable assurance that the indirect method can be correlated with actual measurements.

Procedure BwRP 5600-6, "Scaling Factor Determination," revision 0, was prepared by the licensee to ensure that indirect methods, i.e. scaling factors, can be correlated with actual sample measurements.

Step F 2 c of procedure BwRP 5600-6 required that if any of the radionuclide scaling factors calculated for an individual waste stream sample differed from the current scaling factor by a factor of 10 or more, an additional sample of the waste stream be sent to an off-site laboratory for analysis.

Contrary to the above, the inspector identified that on August 12, 1994, March 28, 1995, and June 5, 1996, the licensee did not provide reasonable assurance that indirect methods could be correlated with actual measurements. Specifically, the licensee did not re-sample waste streams which differed from current scaling factors by a factor of ten or greater.

### REASON FOR THE VIOLATION

BwRP 5600-6, "Scaling Factor Determination" Procedure, pertains to the analysis of radiological waste streams at Braidwood Station and is performed on an annual basis. The procedure, classified as "Reference Use", is used to perform statistical analyses of waste stream samples. Sample results that fall outside of a predetermined range are considered "outliers." Step F 2 c 11 in the procedure requires that these "outlier" samples be analyzed offsite.

During a recent inspection, no records could be found to show that the outlier samples had been sent offsite for analysis as required in 1994, 1995, and 1996. Personnel who performed BwRP 5600-6 during those years failed to complete the step in the procedure requiring this action. Although the individual responsible for performing the procedure in 1994 and 1995 is no longer a ComEd employee, the individual was contacted to determine why he did not satisfy the procedure requirement. As the original author of the procedure, the individual assumed that he was aware of all of the procedure requirements. Therefore, when the outliers were discovered, he did follow up with the offsite analysis vendor to discuss the results. The individual rationalized that the follow up actions taken were appropriate, however these actions did not satisfy the requirements stated in the procedure. The individual responsible for performing the procedure in 1996 was also interviewed to determine why he did not adhere to the procedure. This individual

## ATTACHMENT 1

### REPLY TO NOTICE OF VIOLATION VIOLATION (50-456(457)/97011-01)

communicated that he reviewed the entire procedure prior to executing the steps as required for procedures classified as "Reference Use". While performing the procedure, the individual was focused on complicated data analysis sections of the procedure, which were executed over a several day period, and through inattention to detail, he failed to satisfy the requirement to send additional samples offsite for analysis as required for outlier samples.

### CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The individual who performed the BwRP 5600-6 in 1996 was counseled on procedure adherence expectations.

The Station performed a technical evaluation of the procedure adherence deficiency. Based on a review of the source document which was used as a reference when the procedure was initially written and a discussion with the author of the source document, the Station concluded that the circumstances would have had no impact on waste classifications.

### ACTIONS TAKEN TO PREVENT RECURRENCE

Braidwood Station has continued to reinforce expectations associated with procedure adherence during quarterly Human Performance sessions. These meetings have served to heighten awareness levels of Station personnel of their responsibilities when following procedures.

The requirement of performing additional analyses of outlier samples is being reviewed and revisions will be made as necessary. In addition to revising the outlier sampling requirement, the Station plans to enhance the procedure by adding an additional signature block for a secondary reviewer. This change will provide additional assurance that the procedure was completed as required.

### DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved when the individual who failed to perform the procedure as required was counseled on procedure adherence expectations.