



Commonwealth Edison

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July 27, 1989

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 & 2 Response to Inspection
Report Nos. 50-456/89-014 and 50-457/89-014, NRC Docket
Nos. 50-456 and 50-457

REFERENCE: E. G. Greenman letter to C. Reed dated May 26, 1989

Dear Mr. Davis:

This letter is in response to the inspection conducted by an NRC Augmented Inspection Team composed of E. McKenna, G. VanSickle, and M. Kunowski of your office, S. Sands of the Office of Nuclear Reactor Regulation and an NRC Consultant, S. Nealey, on April 25 through April 28, 1989, of activities at Braidwood Station. The above reference requested that Commonwealth Edison (Edison) respond documenting our actions to the inattentiveness incidents. The Edison response to these items is provided in the enclosure.

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

T. J. Kovach
Nuclear Licensing Manager

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(8569z)

ENCLOSURE

cc: NRC Resident Inspector - Braidwood
NRC Document Control Desk

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ENCLOSURE
COMMONWEALTH EDISON COMPANY'S
RESPONSE TO INSPECTION REPORT

Nos. 456/89014 and 457/89014

RECOMMENDATIONS:

As a result of this inspection, the team developed the following recommendations which relate to improvements in attentiveness.

- A. Management needs to be sensitive to tasks which may be conducive to inattentiveness, due either to environmental conditions or the monotony of the job and to take steps to minimize the problem. Such steps should include:
 - * Rotate people through these jobs on a more frequent basis, during the shift. This step was already being used by the licensee for the guard force.
 - * Improve the environment affecting the job, such as by installation of an environment barrier, or relocation of the duty station. As stated in Paragraph 3B, the licensee had been evaluating various plans for improving the environment of the RCA control point since December 1988.
 - * Establish formal mechanism for individuals to receive relief if needed.
- B. Management should establish a consistent policy defining when and where sleeping on site is permitted and communicate this policy to all employees. The policy should address lunch breaks, overtime and waiting times for activities, as applicable.
- C. The licensee should conduct periodic refresher training for all station employees on:
 - * Attention to duty
 - * Methods that individuals can employ to prevent sleeping on the job
 - * Company policy on sleeping on site
- D. The licensee should consider extending recommendations to other CECO stations.

RESPONSE:

- A. At Braidwood Station the Radiation Protection Department is taking steps that should alleviate the conditions that led to the inattentiveness of the Radiation Protection Technician (RPT). The control station on the 401' level is being moved from the Turbine Building into the Auxiliary Building. This change should reduce both the noise level and the temperature conditions associated with the work station. The RPT has already been repositioned inside the Aux Building and plans are underway to move the whole body contamination monitors into the Aux Building.

Additionally, work reliefs are provided to the RPT on a schedule so that conditions that could produce inattentiveness do not occur. All RPTs have been given instruction that, should conditions develop that could possibly lead to inattentiveness to duty, the foreman should be contacted.

- B. A policy has been established in a Vice President's Instruction that applies to all persons reporting to and gaining access to a nuclear station's property.

The instruction defines the on duty requirements and specifically addresses off duty periods and areas. The policy is being distributed as part of the Commonwealth Edison Fitness for Duty Program.

- C. Periodic refresher training covering: 1) attention to duty, 2) methods that individuals can employ to prevent sleeping on the job and 3) the Commonwealth Edison Company Policy on sleeping on site will be included in the annual retraining program conducted for all station employees. This material will be incorporated into the training program beginning with the 1990 program.

- D. The Vice President's Instruction applies to all persons reporting to and gaining access to a nuclear station's property.

In addition to the above mentioned actions taken by Braidwood Station and the corrective actions already discussed in the Inspection Report, the importance of attentiveness to duty was emphasized during a week long training program conducted for all incumbent station supervisors and upper level station management personnel.

Inattentiveness to duty has been and will continue to be discussed by the Station Manager through his addresses at the different station department meetings of Braidwood Station.