



**Commonwealth Edison**

72 West Adams Street, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690 - 0767

April 12, 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 and 2 Response to Inspection  
Report Nos. 50-456/89-006 and 50-457/89-006  
NRC Docket Nos. 50-456 and 50-457

Reference: (a) L. R. Greger letter to C. Reed dated March 15, 1989

Dear Mr. Davis:

This letter provides Commonwealth Edison's response to the inspection conducted by Messrs. M. A. Kunowski and R. J. Caniano on February 14-17, 1989 of activities at Braidwood Station as reported in reference (a). Reference (a) indicated that certain activities appeared to be in violation of NRC requirements.

The Commonwealth Edison response to this issue 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

TJK/jab  
0059T:55

Enclosure

cc: NRC Resident Inspector-Braidwood  
Document Control Desk-NRC

IEG  
/1

8905050252 890412  
PDR ADOCK 05000456  
Q PDC



ENCLOSURE

COMMONWEALTH EDISON COMPANY

RESPONSE TO INSPECTION REPORT 456/89006 AND 457/89006

VIOLATION:

Technical Specification 6.11 requires that procedures for personnel radiation protection shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Braidwood Procedure, BWRP 1210-4, requires that any employe who works in a radioactive materials area or an airborne radioactivity area will receive a bioassay following his work assignment at the station, unless an exception is granted by health physics supervision.

Contrary to the above, on July 20, 1988, an individual who had worked in a radioactive materials area at the station did not receive a bioassay following his work assignment and an exception had not been granted.

RESPONSE:

Braidwood Station acknowledges that one individual who had worked in a radiation materials area did not receive a bioassay following his work assignment nor was an exception granted as required by Braidwood procedures.

Braidwood Station reviewed its bioassay records and believes this to be an isolated incident and, as noted in the inspection report, does not appear to be indicative of a significant programmatic weakness. Braidwood Station's radiation protection program continues to be effective in protecting the health and safety of occupational workers and the public.

In order to provide a more conservative radiation protection program, Braidwood Station has in place additional procedural requirements for the bioassay. Title 10, Chapter 20 of the code of Federal Regulations requires a bioassay be performed for individuals exposed to radioactive materials in air in restricted areas. Braidwood Procedure BWRP 1210-4 "Radiation Chemistry Exit Interview" requires a bioassay or evaluation for all personnel terminating work assignments in radiologically controlled areas.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

An evaluation was performed which included a review of personnel contamination reports, Radiation Work Permits, dosimetry records and air samples pertinent to the individual's. This evaluation indicated that the individual was not exposed beyond regulatory limits while at the station.





CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATION:

Procedure BWRP 1210-4 "Radiation Chemistry Exit Interview" will be revised to include a periodic check of Security termination records in order to verify that personnel receive the necessary bioassay or evaluation. This procedure change is expected to be completed by July 1, 1989.

DATE OF FULL COMPLIANCE:

Full compliance is expected to be achieved by July 1, 1989.

8 (Dress)