October 19, 2000

Mr. Oliver D. Kingsley President, Nuclear Generation Group Commonwealth Edison Company ATTN: Regulatory Services Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

SUBJECT: BRAIDWOOD - NRC INSPECTION REPORT 50-456-00-12(DRP); 50-457-00-12(DRP)

Dear Mr. Kingsley:

On September 30, 2000, the NRC completed an inspection at your Braidwood Units 1 and 2 reactor facilities. The results were discussed with Mr. Tulon and other members of your staff. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, this inspection focused on resident inspection activities.

Based on the results of this inspection, no findings were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available <u>electronically</u> for public inspection in the NRC Public Document Room <u>or</u> from the *Publicly Available Records (PARS) component of NRC's document system (ADAMS)*. ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/NRC/ADAMS/index.html</u> (the Public Electronic Reading Room)."

O. Kingsley

We will gladly discuss any questions you have concerning this inspection

Sincerely,

/RA/

Michael J. Jordan, Chief Reactor Projects Branch 3

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

- Enclosure: Inspection Report 50-456-00-12(DRP); 50-457-00-12(DRP)
- cc w/encl: D. Helwig, Senior Vice President, Nuclear Services C. Crane, Senior Vice President, Nuclear Operations H. Stanley, Vice President, Nuclear Operations R. Krich, Vice President, Regulatory Services DCD - Licensing T. Tulon, Site Vice President K. Schwartz, Braidwood Station Manager T. Simpkin, Regulatory Affairs Manager M. Aguilar, Assistant Attorney General State Liaison Officer Chairman, Illinois Commerce Commission

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O. Kingsley

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: License Nos:	50-456; 50-457 NPF-72; NPF-77
Report Nos:	50-456-00-12(DRP); 50-457-00-12(DRP)
Licensee:	Commonwealth Edison Company (ComEd)
Facility:	Braidwood Nuclear Power Station, Units 1 and 2
Location:	35100 S. Route 53 Suite 84 Braceville, IL 60407-9617
Dates:	August 22 through September 30, 2000
Inspectors:	C. Phillips, Senior Resident InspectorN. Shah, Resident InspectorJ. Roman, Illinois Department of Nuclear Safety
Approved by:	Michael J. Jordan, Chief Reactor Projects Branch 3 Division of Reactor Projects

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

Radiation Safety

Safeguards

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness
- Occupational
 Public
- Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

SUMMARY OF FINDINGS

Inspection Report 05000456-00-12, 050000457-00-12; on 08/22-09/30/00; Commonwealth Edison; Braidwood Nuclear Power Station; Units 1 & 2. Resident Operations Report.

The inspection was conducted by the resident inspectors. There were no findings.

Cornerstone: Initiating Events and Mitigating Systems

• There were no findings identified.

Report Details

Plant Status

Both units operated at full power throughout the inspection period.

1. **REACTOR SAFETY**

Cornerstone: Initiating Events and Mitigating Systems

1R04 Equipment Alignment

- .1 Equipment Alignment Verification of the Unit 2B Auxiliary Feedwater (AF) Pump
- a. <u>Inspection Scope</u>

The inspectors observed the system alignment of the Unit 2B AF diesel driven pump, while the Unit 2A AF motor driven pump was out-of-service for planned maintenance. The inspectors reviewed the following to determine the correct system alignment:

- Braidwood Operating procedure (BwOP) AF-M2, "Operating Mechanical Lineup Unit 2," Revision 4E1;
- Braidwood Limiting Condition for Operation Action Response procedure (LCOAR) 2BwOL 3.7.5, "LCOAR Auxiliary Feedwater System Technical Specification Limiting Condition for Operation No. 3.7.5," Revision 2; and
- Station Drawing M-122, dated April 11, 1997, "Diagram of Auxiliary Feedwater, Unit 2."

The inspectors performed walkdowns of the accessible portions of the system and reviewed the system lineup and selected system operating parameters (i.e., diesel fuel oil level, pump and bearing lube oil levels, room temperature, electrical breaker position, etc). In addition, the inspectors reviewed the Updated Final Safety Analysis Report and Technical Specifications.

b. Findings

There were no findings identified.

- .2 Equipment Alignment of the Unit 2A Residual Heat Removal (RH) Pump
- a. Inspection Scope

The inspectors observed the system alignment of the Unit 2A RH Pump, while the Unit 2B RH pump was out-of-service for planned maintenance. The inspectors reviewed the following to determine the correct system alignment:

- BwOP RH-M4, "Operating Mechanical Lineup Unit 2, 2B Train," Revision 4;
- BwOP RH-M3, "Operating Mechanical Lineup Unit 2, 2A Train," Revision 4; and
- Station Drawing M-137, dated October 22, 1997, "Diagram of Residual Heat Removal, Unit 2."

The inspectors performed walkdowns of the accessible portions of the system and reviewed the system lineup and selected system operating parameters (i.e., RH pump oil levels, room temperature, etc). In addition, the inspectors reviewed the applicable sections of the Updated Final Safety Analysis Report and the Technical Specifications.

b. Findings

There were no findings identified.

- .3 Electrical Alignment Verification of Unit 2
- a. <u>Inspection Scope</u>

The inspectors reviewed the electrical alignment of Unit 2, while the Unit 1 system auxiliary transformers (SATs) were de-energized. During this period, electrical power was being provided by the Unit 2 SATs. Specifically, the inspectors performed walkdowns of the Unit 2 SATs and associated electrical buses and breakers, the turbine roof areas overlooking the Unit 2 SATs, and the Units 1 and 2 diesel generators. The inspectors reviewed the following documents during this inspection:

- BwOP AP-E-6, "Electrical Lineup–Unit 2: Operating Lineup for the 6900 Volt Buses," Revision 2;
- BwOP AP-E-7, "Electrical Lineup–Unit 2: Operating Lineup for the Safety-Related 4160V Buses, 480V Switchgear Buses, and 480V Motor Control Centers," Revision 3E3;
- Units 1 and 2 shift manager and nuclear shift operator control room logs for September 15 (shift 3) and September 16 (shift 1), 2000; and
- Station drawings 20E-1-4001A, dated January 14, 1980, "Station One Line Diagram," and 20E-2-4001A, dated January 13, 1980, "Station One Line Diagram."

The inspectors also reviewed the applicable sections of the Updated Final Safety Analysis Report and the Technical Specifications.

b. <u>Findings</u>

There were no findings identified.

1R05 Fire Protection

.1 <u>Unit 1 Division 12 and Unit 2 Division 22 Engineered Safety Feature (ESF) Switchgear</u> <u>Rooms</u>

a. Inspection Scope

The inspectors evaluated the licensees fire protection controls for the Unit 1 Division 12 (fire zone 5.1-1) and Unit 2 Division 22 (fire zone 5.1-2) ESF switchgear rooms. These areas were selected, because they had a high associated fire induced core damage frequency. Specifically, the inspectors performed a walkdown of the areas to observe conditions related to the control of transient combustibles and ignition sources; the material condition, operational lineup, and operational effectiveness of fire protection systems, equipment and features; and the material condition and operational status of fire barriers. The inspectors compared the areas (including associated fire protection and mitigation equipment) to what was described for those areas in the Braidwood Fire Protection Plan, dated December 1988.

The following documents were reviewed during this inspection:

- Braidwood Fire Protection Plan for Unit 1, dated December 1988, Sections 2.3.5.1 and 2.4.2.15;
- Braidwood Fire Protection Plan for Unit 2, dated December 1988, Sections 2.3.5.2 and 2.4.2.16;
- Station drawings 2.3-10 (dated December 1996), 2.3-25 (dated December 1998), 2.3-35 (dated May 1986), and BR-E-05A (dated July 23, 1986);
- Action request 970094161, "Repair/Grout 1 Inch Hole in Fire Rated Wall;"
- Penetration seal package E136105282 (dated December 31, 1986) and E2351031A0 (dated July 9, 1987); and
- Transco test report TR-161, "Fire and Hose Stream Tests of TCO-001 Cement, TCO-002 Medium Density Silicone, and TDCO-007 Silicone Adhesive Used in Electrical Conduit and Blockout Penetrations," dated November 20, 1984.

b. Findings

There were no findings identified.

1R11 Licensed Operator Requalification Program

a. Inspection Scope

The inspectors reviewed the implementation of the licensee's licensed operator requalification program by observing simulator refresher training conducted on September 9, 2000. Specifically, the inspectors observed operator response to a

simulated event involving a steam generator tube rupture coincident with a loss of coolant accident, as described in licensee scenario BR-7, dated June 27, 2000.

The inspectors observed that the training was monitored by the licensee's staff and how operators responded to the simulated event correctly. The inspectors also observed how operations responded to alarms, communicated plant conditions, and made emergency declarations. The inspectors also selectively compared the simulator equipment to actual control room equipment.

b. <u>Findings</u>

There were no findings identified.

- 1R12 Maintenance Rule Implementation
- .1 <u>Maintenance Rule Implementation of Deficiencies Associated With the Unit 2A AF Motor</u> Driven Pump and the 214 Instrument Bus
- a. Inspection Scope

The inspectors evaluated the licensee's implementation of the Maintenance Rule, 10 CFR Part 50.65, as it pertained to identified performance problems with the Unit 2A AF motor driven pump and the 214 Instrument Bus. During this inspection, the inspectors evaluated the licensee's monitoring and trending of performance data, reviewed performance criteria, reviewed the disposition of equipment problems in accordance with the maintenance rule, and reviewed the appropriateness of (a)(1) goals and corrective actions if any. The inspectors interviewed the station's maintenance rule coordinator and responsible system engineers. The inspectors reviewed the following:

- PIF A1999-03486, "NEI/NRC Performance Indicator MS-3 (AF) Unavailability Value Over Reported;" and
- CR A2000-02689, "Concerns With Level of Monitoring for Ventilation Supply to Motor-Driven AF Pumps Under Maintenance Rule."
- CR A2000-02126, "Degraded Voltage On Instrument Bus 214;"
- CR A2000-02525, "Availability Criteria For Maintenance Rule Function IP1 Exceeded;"
- Nuclear Station Procedure ER-AA-310, "Maintenance Rule," Revision 0;
- Root Cause Evaluation AT#28260, "Failure of Ferro-resonance Transformer In Instrument Inverter 214 Due To Inadequate Preventive Maintenance;" and
- Calculation BRW-97-0938-N, "PSA Probabilistic Safety Analysis Basis for Braidwood's Maintenance Rule Performance Criteria," Revision 2.

b. Findings

There were no findings identified.

1R13 Maintenance Risk Assessments And Emergent Work Control

a. Inspection Scope

The inspectors reviewed the licensee's assessment and management of plant risk for planned maintenance activities on the Unit 2A AF motor driven pump, the Unit 2B RH system pump, and the Unit 1 SATs. The inspectors selected these maintenance activities because they involved systems that were risk significant in the licensee's risk analysis.

During this inspection, the inspectors assessed the operability of redundant train equipment, observed the use of the on-line risk monitoring software by the licensee, and evaluated the licensee's implementation of actions to minimize plant risk. The inspectors attended shift briefings and daily status meetings to review the licensee's actions to maintain a heightened level of awareness of the plant risk status among plant personnel. The inspectors reviewed Nuclear Station procedure WC-AA-103, "On-Line Maintenance," Revision 0.

b. Findings

There were no findings identified.

- 1R15 Operability Evaluations
- a. Inspection Scope

The inspectors evaluated the licensee's determination of operability as described in CRs pertaining to the failure to evaluate NRC Generic Letter 96-06 during the essential service water system discharge pipe extension modification, sporadic operation of the Unit 1 N-43 power range monitor, and the over temperature delta T reactor trip functionality after an error was identified in the most recent 18-month Unit 2 delta T loop calibration.

Specifically, the inspectors reviewed the following documents:

- CR A2000-03436, "Spurious Power Range Flux Deviations;"
- CR A2000-03257, "Unit 1 Power Range Lower Detector Flux Deviation High Alarm;"
- Braidwood Annunciator Response Procedure (BwAR) 1-10-A7, "Rod Deviation Power Range Tilt," Revision 10E3;
- BwAR 1-10-B4, "Power Range Lower Detection Flux Deviation High," Revision 6E1;

- CR A2000-03428, "Unit 2 Loop Delta T Calibrations;"
- Calculation NED-I-EIC-0014, "T_{avg}-Delta T Channel Error Analysis," dated September 17, 1998;
- Work Request 990192601-01, "Incore-Excore Axial Flux Quarterly Calibration;"
- Work Request 990164463-01, "1N-NR8043 Quarterly Excore Power Range AFD/7300 Delta Flux Calibration;"
- CR A2000-03215, "Inadequate Design Review of the Service Water Discharge Piping Design Change Package;"
- Operability Determination 00-006, dated August 16, 2000, associated with CR A2000-03215;
- 10 CFR 50.59 Safety Evaluation BRW-SE-2000-592, dated December 27, 1999, supporting the extension of the essential service water return piping at the lake discharge structure (modification D20-0-00-333); and
- NSP-CC-3001, "Operability Determination Process," Revision 0.

The inspectors observed that the licensee had entered these degraded components into their corrective actions program.

b. <u>Findings</u>

There were no findings identified.

- 1R19 Post Maintenance Testing
- .1 <u>Unit 2A AF Motor Driven Feedwater Pump Post Maintenance Testing Following</u> <u>Completion of Minor Maintenance Activities</u>
 - a. Inspection Scope

The Unit 2A AF motor driven feedwater pump was taken out-of-service to perform several, routine maintenance activities such as: disassembly and inspection of the AF pump lube oil cooler; sampling of lubricating oil for routine analysis; and limitorque, cleaning and lubing of the service water suction valves and other system components. The licensee also performed calibrations of the AF pump suction loop and the AF to steam generator 2C flow control loop.

The inspectors observed that control room and engineering personnel were aware of the effect that the testing would have on plant operation. The inspectors reviewed the scope of the work performed and evaluated the adequacy of the specified post maintenance testing performed; observed selected portions of the maintenance and testing activities; reviewed test data; and conducted walkdowns of the engine and support equipment shortly after the completion of maintenance activities. The following documents were reviewed during this inspection:

- Shift managers logbook entries (both Units) dated August 22 to 23, 2000;
- Braidwood Instrumentation Surveillance Procedure (BwISR) 3.3.4.2-202, "Surveillance Calibration of Auxiliary Feedwater to Steam Generator 2C Flow Control Loop," Revision 1E1;
- BwISR 3.3.2.10-217, "Operational Test/Surveillance Calibration of Auxiliary Feedwater Pump Suction Loop 2AP-AF051," Revision 0E2;
- Work Request 990055975-01, "Disassembly and Inspection of the Unit 2 AF Motor Driven Pump Lube Oil Cooler;"
- Work Request 990194686-01, "Functional Check of the Unit 2A Auxiliary Feedwater Pump Service Water Suction Pressure Loop 2PSL-AF051;"
- Work Request 990055996-01 and 990055977-01, "Equipment Lubricant Sampling of the Unit 2A Auxiliary Feedwater Service Water Suction Valves;
- Work Request 990055991-01, "Environmental Qualification of the Unit 2A Auxiliary Feedwater Service Water Suction Valve;"
- Work Request 990041287-01, "Electronic Calibration of Auxiliary Feedwater Flow to the Unit 2 "C" Steam Generator;" and
- CR A2000-03481, "Cannot Locate AF Pump Run Data Sheet for August 23," which was written in response to an NRC observation.

The inspectors reviewed that the tests were performed in accordance with the procedures, that the procedures clearly stated acceptance criteria, and that acceptance criteria was met. The inspectors reviewed that test equipment used during the performance of the above listed procedures were calibrated.

b. Findings

There were no findings identified.

.2 <u>Unit 2B_RH Pump Post-Maintenance Testing Following Completion of Minor</u> <u>Maintenance Activities</u>

a. Inspection Scope

The Unit 2B RH pump was taken out-of-service to perform several, routine maintenance activities including inservice testing (valve stroke, position indication and actuation testing) of selected system valves; replacement of the pressure relief valve for the containment sump 2B isolation valve 2SI8811B; and Technical Specification required surveillance testing of the Unit 2B RH pump and associated suction and discharge check valves.

The inspectors observed that control room and engineering personnel were aware of the effect that the testing would have on plant operation. The inspectors reviewed the

scope of the work performed and evaluated the adequacy of the specified post maintenance testing performed; observed portions of the Unit 2B RH pump surveillance testing; reviewed test data; and conducted a partial system walkdown, after completion of maintenance activities.

The following documents were reviewed during this inspection:

- Work Request 990177267-01, "Stroke Test Valve 2SI8811B/2CV8111;"
- Work Request 990079697-01, "Unit 2 Safety Injection (SI) Isolation Valve SI8811B 18 Month Position Indication Surveillance;"
- Work Request 990079698-01, "Unit 2 Train B containment Sump Valve 2SI8811B Stroke 18 Month Surveillance;"
- Work Request 990134381-01, "Unit 2 Train B SI Isolation Valve (SI8812B) 18 Month Position Indication Surveillance;"
- Work Request 990183993-01, "Unit 2 Train B RH System Valve (2RH611 and 2SI8812B) Stroke Monthly Surveillance;"
- Work Request 990182648-01, "Install and Test Relief Valve for 2SI8811B;"
- Work Request 990184964-01, "American Society of Mechanical Engineers Surveillance Requirement for the Unit 2B RH Pump;"
- CR A2000-03532, "Loss of Reactor Water Storage Tank Level During Filling and Venting of the Unit 2B RH Pump;"
- BwOP RH-12, "Fill and Vent of the Residual Heat Removal Pump and Heat Exchanger after Pump Maintenance," Revision 3; and
- Shift manager log entries from shift 3 of September 6, 2000, to shift 1 of September 8, 2000.
- b. Findings

There were no findings identified.

- .3 <u>2A Centrifugal Charging (CV) Pump</u>
- a. Inspection Scope

The inspectors observed that control room and engineering personnel were aware of the effect that the testing would have on plant operation. The inspectors reviewed the scope of the work performed and evaluated the adequacy of the specified post maintenance testing performed; observed portions of the work surveillance; reviewed completed test data; and conducted walkdowns of the system and support equipment shortly after the completion of maintenance. The inspectors observed or reviewed the following:

- Work Request 990179656-02, "Install Modification D20-2-00-330;"
- Design Change Test Procedure D20-2-00-330-1, "Provide Alternate Cooling to 2A Charging Pump Oil Coolers Modification Test," Revision 0;
- Braidwood Engineering Surveillance Procedure 2BwVSR 5.5.8.CV.1, "American Society of Mechanical Engineering Surveillance Requirements For The 2A CV Pump," Revision 2.

b. <u>Findings</u>

There were no findings identified.

1R22 <u>Surveillance Testing</u>

a. Inspection Scope

The inspectors evaluated the surveillance testing activities listed below. The inspectors witnessed surveillance testing, and reviewed test data and licensee procedural requirements. The inspectors also reviewed the licensee's in-service testing methods and acceptance criteria.

Specifically, the inspectors reviewed the following:

- Work Request 990179723-01, "Measure Unit 2A Diesel Generator Spin Down Time;"
- Work Request 990033041, "Unit 2A Diesel Generator Pre-outage Engine Analysis;"
- BwVS 900-8, "Diesel Generator Engine Analysis," Revision 6;
- 2BwVS 8.1.1.2.e-1, "2A Diesel Generator 18 Month, 5 Year and 20 Year Inspections," Revision 6;
- CR A2000-03456, "Revise Procedure to Reflect Current Verbiage for 'Apart-in-Action' Verification," which was written in response to an NRC observation;
- Work Request 990183224-01, "Unit 2 125 Volt DC ESF Battery 211 Quarterly Surveillance;" and
- Braidwood Operating Surveillance Procedure 2BwOSR 3.8.6.2-1, Unit 2 125 Volt DC ESF Battery Bank and Charger 211 Operability Quarterly Surveillance," Revision 0E2.

1R23 <u>Temporary Plant Modifications</u>

a. Inspection Scope

The inspectors reviewed the following:

- Temporary plant modification package 00-0-004, "Provide Alternate Fuel Supply For Station Heating Steam Boiler To Support Testing/Repairs of Fuel Oil Supply and Return Lines;"
- Safety Evaluation Screening Validation BRW-SESV-2000-0581;
- Safety Evaluation BRW-SE-2000-886;
- BwOP DO-6, "Filling A Unit 1 Diesel Generator Storage Tank From A Tanker Truck;"
- CC-AA-112, "Temporary Modifications," Revision 2; and
- Station Drawing M-50, Sheet 2, "Diagram of Diesel Fuel Oil," dated April 27, 1987.

The inspectors reviewed the corrective actions for the following CR:

• CR A2000-03711, "High Total Contaminant Level in West Diesel Temporary Diesel Fuel Tank."

The inspectors observed the physical installation of the temporary fuel tanks and lines. The inspectors also interviewed licensed and non-licensed operations personnel regarding the temporary modification installation.

b. Findings

There were no findings identified.

4. OTHER ACTIVITIES

- 4OA1 Performance Indicator Verification
- .1 <u>Safety System Unavailability, Residual Heat Removal System</u>
- a. Inspection Scope

The inspectors reviewed the residual heat removal system performance Indicator data reported by the licensee for April 1997 through March 2000 for Unit 1 and Unit 2. This was accomplished in part through evaluation of the control room logs for LCOAR times for the system and required support systems, a general review of system CRs for evidence of unavailability, and discussions with licensee personnel.

b. <u>Findings</u>

There were no findings identified.

.2 Safety System Unavailability, AF System

a. Inspection Scope

The inspectors reviewed the AF system performance indicator data reported by the licensee for April 1997 through June 2000 for Unit 1 and Unit 2. This was accomplished in part through evaluation of the control room log LCOAR times for the system and required support systems, and discussions with licensee personnel.

The inspectors reviewed the following document:

 CR A2000-03562, "Incorrect Data Value Entered In NEI/NRC Performance Indicator."

The inspectors reviewed the corrective actions for the following CR:

- CR A2000-01971, "Potential Error Discovered with NRC/NEI PI Data Input," for corrective action effectiveness.
- b. Findings

The inspectors identified that the licensee reported the amount of unavailability time for the 1A and 1B AF pumps incorrectly for the month of January 2000. Licensee personnel inadvertently duplicated December 1999 unavailability information for January 2000 in the first quarter report. The 1A pump data showed 23.5 hours more unavailability than actually occurred and the 1B pump data reported was 1.4 hours less than actually occurred. Since the actual indicator value reported is an average unavailability for the two trains the number reported to the NRC was conservative and did not impact the indicator color. The licensee entered this into their corrective action program in CR A2000-03562, "Incorrect data value entered in NEI/NRC Performance Indicator (Jan 2000)." One corrective action was to review all the performance indicator data for similar mistakes. One minor additional error was identified, the value for the 2A AF pump for May 2000 was reported as .75 hours when it was actually .075 hours. The failure to accurately report the Performance Indicator data is a violation of minor significance and is not subject to formal enforcement action in accordance with Section IV of the NRC's Enforcement Policy. This finding, although minor, impacts the NRC's ability to perform its regulatory function if the information provided is not correct.

40A6 Meetings

.1 Exit Meeting Summary

The inspectors presented the inspection results to Mr. Tulon and other members of licensee management at an exit meeting on October 2, 2000. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

<u>Licensee</u>	
T. Tulon	Site Vice President
K. Schwartz	Station Manager
T. Luke	Site Engineering Director
J. Harvey	Nuclear Oversight
T. Simpkin	Regulatory Assurance Manager
R. Graham	Work Management Manager
L. Guthrie	Maintenance Manager
C. Dunn	Operations Manager
B. Schramer	Chemistry Manager
D. Goldsmith	Radiation Protection Manager
G. Baker	Site Security
J. Bailey	Regulatory Assurance - NRC Coordinator
NRC	
M. Jordan	Branch Chief, Division of Reactor Projects
C. Phillips	Senior Resident Inspector

N. Shah Resident Inspector

Illinois Department of Nuclear Safety

J. Roman Resident Engineer

LIST OF BASELINE INSPECTIONS PERFORMED

The following inspectable-area procedures were used to perform inspections during the report period. Documented findings are contained in the body of the report.

Inspection Procedure		Report
<u>Number</u>	Title	Section
71111-04	Equipment Alignment	1R04
71111-05	Fire Protection	1R05
71111-11	Licensed Operator Requalification Program	1R11
71111-12	Maintenance Rule Implementation	1R12
71111-13	Maintenance Risk Assessments And Emergency Work Control	1R13
71111-15	Operability Evaluations	1R15
71111-19	Post Maintenance Testing	1R19
71111-22	Surveillance Testing	1R22
71111-23	Temporary Plant Modifications	40A1
71151	Performance Indicator Verification	40A1

LIST OF ACRONYMS USED

AF	Auxiliary Feedwater
BwAR	Braidwood Annunciator Response Procedure
BwIS	Braidwood Instrumentation Surveillance Procedure
BwOL	Braidwood Limiting Condition For Operation Action Response Procedure
BwOP	Braidwood Operating Procedure
BwOS	Braidwood Operating Surveillance Procedure
BwVSR	Braidwood Engineering Surveillance Procedure
CFR	Code of Federal Regulations
CR	Condition Report
CV	Centrifugal Charging
ESF	Engineered Safety Features
LCOAR	Limiting Condition for Operation
NRC	Nuclear Regulatory Commission
NRR	Nuclear Reactor Regulations
PIF	Problem Identification Form
RH	Residual Heat Removal
SAT	System Auxiliary Transformers
SI	Safety Injection
T _{avg}	Reactor Coolant Average Temperature