

Commonwealth Edison Company
Braidwood Generating Station
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February 4, 2000
BW000003

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

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. 50-456 and 50-457

Subject: Regulatory Commitment Change Summary Report

Please find enclosed the "Regulatory Commitment Change Summary Report" for Braidwood Station.

This report contains summary information from January 1, 1999, through December 31, 1999. Revisions to docketed regulatory commitments were processed using Nuclear Energy Institute's (NEI's) guidance for Managing Nuclear Regulatory Commission (NRC) Commitments, Revision 2, dated December 19, 1995.

If you have any questions concerning this letter, please contact Mr. T. W. Simpkin at (815) 458-2801, extension 2980.

Respectfully,

A handwritten signature in black ink, appearing to read "T. J. Tulon", is written over the typed name.

Timothy J. Tulon
Site Vice President
Braidwood Station

Attachment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Original Document:

Reply to Nuclear Regulatory Commission (NRC) Notice of Violation (Inspection Report #94004)

Subject of Change:

Revision to the process used by Independent Safety Engineering Group (ISEG) to address follow-up and closure of issues identified by ISEG personnel.

Original Commitment:

ISEG identified noncompliances and recommendations will be issued as Corrective Action Records (CARs). Follow-up and closure are in accordance with Nuclear Oversight Procedures.

Revised Commitment:

ISEG identified noncompliances will be issued in accordance with the Station's Corrective Action Program. In addition, ISEG recommendations will be tracked with an action item also initiated in accordance with the Corrective Action Program.

Basis:

The former Site Quality Verification organization, including the ISEG function, reorganized to become Nuclear Oversight. The CAR process was eliminated since it was considered redundant to the Problem Identification Form (PIF) process for corrective actions. The intent of the original commitment was to provide follow-up and closure for ISEG identified issues. The use of the Corrective Action Program to address ISEG identified issues meets the intent of the original commitment. Follow-up of corrective action adequacy is controlled in accordance with Nuclear Oversight procedure NO-AA-11, "Nuclear Oversight Continuous Assessment Process".

Status:

The commitment change was implemented at Braidwood Station following the Nuclear Oversight reorganization.

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Original Document:

Reply to NRC Notice of Violation (Inspection Report #97007)

Subject of Change:

Change in scope of original commitment.

Original Commitment:

Following procedure problems that were identified during surveillance testing where test directors failed to perform specific actions, the following commitment was made: "A training class is being developed to include information on expectations associated with the roles and responsibilities of Test Directors. In addition, a Test Director certification form is being created which will be included in the System Engineer Certification Program."

Revised Commitment:

The revised commitment no longer includes the use of a certification form for Test Directors.

Basis:

Test Director Training was developed and provided to System Engineering personnel in the fall of 1998. This training included the following elements:

- Overview of Industry Events
- "Conduct of testing" manual review
- Review of select administrative procedures associated with testing
- A demonstration emphasizing the importance of "Heightened Level of Awareness" (HLA) meetings and test performance

In addition, emphasis on procedure adherence was discussed with System Engineering personnel in early 1999.

After revisiting the issue, a decision was made to no longer pursue the development of a formal certification guide. The training provided to individuals who perform the test director function was determined to be sufficient to address the original concern.

Status:

The change to this commitment has been implemented.

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Original Document:

Letter from T. Maiman (ComEd) to A. B. Beach (U.S. NRC) dated November 12, 1996.

Subject of Change:

Elimination of the Engineering Assurance Group (EAG).

Original Commitment:

The original commitment involved establishing an Engineering Assurance Group to provide oversight of key engineering activities. The intent was to continue with the EAG function until normal engineering activities had improved where the reviews were no longer needed.

Revised Commitment:

Engineering product quality will be maintained by engineering supervision and self-assessment activities.

Basis:

Direction given by Nuclear Generation Group (NGG) management is to remove the EAG and return the responsibility of quality to the first line supervisors in the Engineering organization.

Status:

Responsibility for continued Engineering product quality has been transferred to In-line Engineering supervision.

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Original Document:

Letter from Karl L. Kaup (ComEd) to John B. Martin (U.S. NRC) dated October 4, 1994, concerning NRC Allegation associated with excessive overtime.

Subject of Change:

Documents referred to in the original commitment no longer exist. The intent of the commitment is now satisfied by newly implemented guidance.

Original Commitment:

"BwAP 100-7, "Overtime Guidelines for Station Personnel," will be revised within 30 days to properly reflect the requirements of the current revision of NOD OA.13."

Revised Commitment:

The requirements previously stated in NOD OA.13, which were originally documented in BwAP 100-7, are now incorporated in RS-AA-119, "Overtime Controls."

Basis:

BwAP 100-7 and NOD OA.13 have been deleted. Overtime requirements are now incorporated in RS-AA-119. The new guidance encompasses the requirements stated in the deleted documents and satisfies requirements stated in Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours."

Status:

RS-AA-119 was implemented at Braidwood Station on September 1, 1999.

**Attachment
Braidwood Station
Regulatory Commitment Change Summary Report**

Original Document:

Letter from Paul C. Shemanski, Project Manager (U.S. NRC) to Thomas J. Kovach (ComEd) dated May 23, 1990, concerning High Density Fuel Storage Racks Blackness Testing

Subject of Change:

Eliminate the original commitment.

Original Commitment:

The original commitment required Braidwood and Byron Stations to perform blackness testing within two years of placing the spent fuel racks in service and continue the blackness testing on a five year frequency.

Revised Commitment:

The implemented change eliminated the original commitment.

Basis:

The initial purpose of performing the blackness testing was to ensure the continued integrity of the neutron absorbing Boraflex material, which was placed within the racks for reactivity suppression. Because the most recent blackness testing results revealed unacceptable Boraflex degradation, both Braidwood and Byron Stations have since revised their Technical Specifications to take credit for soluble Boron in the Spent Fuel Pool, while taking no credit for any of the Boraflex neutron absorbing material that may be left in the racks.

In addition, both Braidwood and Byron Stations plan to replace their spent fuel racks using Boral for reactivity suppression.

Status:

The elimination of the commitment to conduct Blackness Testing took effect following the implementation of the Technical Specification Amendment (Amendment number 86) associated with Soluble Boron Credit.