



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

JUN 25 1979

Docket Nos. 50-317
50-318

Baltimore Gas and Electric Company
ATTN: Mr. A. E. Lundvall, Jr.
Vice President, Supply
P. O. Box 1475
Baltimore, Maryland 21203

Gentlemen:

Subject: Combined Inspection 50-317/79-04; 50-318/79-04

This refers to your letter dated April 27, 1979, in response to our letter dated April 5, 1979.

The corrective and preventive actions which you documented in response to our correspondence were incomplete. As specified in our letter of April 5, 1979, it is necessary that you provide for Items A, B, and C a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Specific comments for Items A, B, and C follow:

With regard to Item A, it should be noted that Section 5.5.2 of the Environmental Technical Specifications requires that all written operating procedures, which includes sampling and radio-analytical procedures, be reviewed by the Environmental Group and approved by the Chief Environmental Engineer. Your attention is redirected to the statements in our letter dated April 5, 1979 which indicated that this item was recurrent or uncorrected and should be given your particular attention. Your response to this item failed to provide the specific corrective action taken or planned to achieve compliance with the requirements and to prevent recurrence and the date when full compliance will be achieved.

With regard to Item B, it should be noted that the analytical methods used by you or your contractor must be capable of achieving the required detection limits. The Lower Limit of Detection (LLD) as required in Table 3.2-2 of the Environmental Technical Specifications (ETS) and as defined in HASL-300 requires that detection

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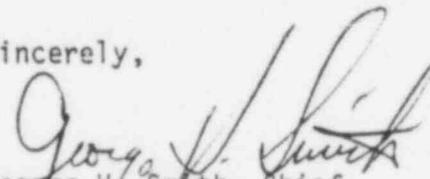
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of the concentrations provided in Table 3.2-2 of the ETS be met at the 95% confidence limit regardless of whether the concentrations are above or below the LLD. It should be also emphasized that the parameters involved in determining the LLD are the counter efficiency, counter background, chemical recovery and sample size. It should be understood that until the ETS proposed changes are approved by the NRC, the current requirements will be met. Your response to this item failed to specify the necessary steps which will be taken to ensure that the required LLDs for Sr-89 and Sr-90 will be met and the date when full compliance will be achieved.

With regard to Item C, it is our understanding that food crops were grown and available in the area of locations 15 and 16 and that the harvest time of soybeans and corn takes place earlier than November and December. It should be understood that until the ETS proposed changes are approved by the NRC, the current requirements will be met. Your response to this item failed to specify the necessary steps which will be taken to ensure that the vegetation samples are collected from the required locations at the required time.

Your statement should be submitted to this office within ten (10) days of your receipt of this letter.

Sincerely,


George H. Smith, Chief
Fuel Facility and Materials
Safety Branch

cc:

R. M. Douglass, Manager, Quality Assurance
L. B. Russell, Chief Engineer
W. Gibson, General Supervisor, Operations QA
R. C. L. Olson, Senior Engineer
K. H. Sebra, Principal Engineer

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