APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company
License Nos. DPR-53; DPR-69

Docket Nos. 50-317
50-318

Based on the results of an NRC inspection conducted on September 13-15 and October 10-13, 1978, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below. Items A and B are infractions; items C and D are deficiencies.

A. 10 CFR 20.201(b), "Survey", states, "Each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in this part;" and, 10 CFR 20.103, "Exposure of individuals to concentrations of radioactive materials in air in restricted areas" states in paragraph (a)(3), "For purposes of determining compliance with the requirements of this section the licensee shall use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas . . . " In addition, Procedure 3-401, "Radiological Survey" developed in accordance with Technical Specification 6.11, "Radiation Protection Program", requires surveys of airborne concentrations to be taken to support evaluations which may cause significant increase in airborne levels or whenever systems or components are opened that contain radioactive material.

Contrary to these requirements, on September 13, 1978, no surveys of the concentrations of radioactive materials in air were made to support the evolutions being performed by four personnel in accordance with Special Work Permit 78-899, which involved the cutting, grinding and welding of a valve (MSW-426) which contained radioactive material such that loose surface contamination on the component was measured as high as 200,000 dpm/100cm^2.

B. Technical Specification 6.13, "High Radiation Area" states in paragraph 6.13.1.a, "In lieu of the control device or alarm signal required by paragraph 20.203(c)(2) of 10 CFR 20: A High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Special or Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area."

Contrary to this requirement are the following examples:

1. On September 13, 1978, an Auxiliary Operator entered a posted and barricaded high radiation area (the Unit 1 Valve Chase Room) without a radiation monitoring device which continuously indicates the radiation dose rate in the area. The radiation intensity in the area was verified to be greater than 100 mrem/hr but less than 1000 mrem/hr.

2. On October 12, 1978, the Unit 1 Charging Pump Room, a high radiation area in which the intensity of radiation was greater than 100 mrem/hr but less than 1000 mrem/hr, was not barricaded in that the door to this room (normally used for the barricade) was open and unattended.

3. On October 11, 1978, the entrance foyer to the Unit 2 Let-Down Heat Exchanger Cubicle, an area in which the intensity of radiation was greater than 100 mrem/hr, but less than 1000 mrem/hr, was not conspicuously posted or barricaded as a high radiation area.

C. 10 CFR 20.203, "Caution signs, labels, signals and controls," states in paragraph (e)(1): "Each area or room in which licensed material is used or stored and which contains any radioactive material (other than natural uranium or thorium) in an amount exceeding 10 times the quantity of such materials specified in Appendix C of this part shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION, RADIOACTIVE MATERIAL(S)." In addition, Procedure 3-705, "Special Maintenance Radiological Control Procedures," developed in accordance with Technical Specification 6.11, "Radiation Protection Program", requires that areas used for the storage of low level contaminated items be kept locked when not attended (not in use).

Contrary to this requirement, on October 11, 1978, the Unit 2 Bulter Building, an area used to store licensed material (other than natural uranium or thorium) in an amount exceeding 10 times the quantity of such material specified in Appendix C of 10 CFR 20 was not conspicuously posted with signs bearing the radiation caution symbol and the words: CAUTION, RADIOACTIVE MATERIAL(S). In addition, the building was unattended (not in use) but was not locked.

D. Technical Specification 6.11, "Radiation Protection Program," states "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

Procedure RCP-3-602, "Radiation Work Permits (RWP)," indicates that personnel shall adhere to the instructions provided on RWPs.

Contrary to this requirement, on October 12, 1978, an individual entered the Unit 2 Charging Pump Room, an area that was designated as a high radiation area (and posted and barricaded in accordance with Technical Specification 6.13, "High Radiation Area"). The individual was performing activities under the control of RWP-78-6, which expressly disallows entry into high radiation areas. Measurements of the intensity of radiation in the area indicated that the levels had declined from the usual 400-600 mrem/hr to 40 mrem/hr as a function of the Unit 2 shutdown, a fact not known to the individual when he entered the area.