

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-317/79-17
50-318/79-14
Docket No. 50-317
50-318
License No. DPR-53
DPR-69 Priority -- Category C

Licensee: Baltimore Gas and Electric Company
P.O. Box 1475
Baltimore, Maryland

Facility Name: Calvert Cliffs Units 1 and 2

Inspection at: Lusby, Maryland

Inspection conducted: October 2-5, 1979

Inspectors: *C. J. Conzill* November 15, 1979
C. J. Conzill, III, Reactor Inspector date signed
D. F. Johnson 11/15/79
D. F. Johnson, Reactor Inspector date signed

Approved by: *D. L. Capton* date signed
D. L. Capton, Chief, Nuclear Support Section 12/3/79
No. 1, RO&NS Branch date signed

Inspection Summary:

Inspection on October 2-5, 1979 (Combined Inspection Report Numbers 50-317/79-17 and 50-318/79-14)

Areas Inspected: Routine, unannounced inspection of licensee actions on previous items, General Training, Technician Training, Reactor Operator Requalification Training, Review of Periodic Reports, Followup on Headquarters Request, Licensee Response on Bulletin 79-10. The inspection involved 59 inspector-hours onsite by two NRC inspectors.

Results: Of the eight areas inspected, no apparent items of noncompliance were identified in seven areas; one apparent item of noncompliance (deficiency - failure to conduct design change review) was identified in one area.

DETAILS

1. Persons Contacted

Principle Licensee Representatives

- * M. Bowman, Supervisor, Quality Assurance Unit
- * J. Carlson, Radiation Safety and Chemistry Foreman
- * J. Carroll, Supervisor, Technical Support
- J. Carter, Supervisor of Quality Control
- * P. Crinigan, Performance Engineer
- R. Denton, Nuclear Plant Engineer - Operations
- * R. Douglass, Manager, Quality Assurance
- * W. Gibson, Nuclear Plant Engineer Performance
- R. Heibel, Performance Engineer - Operations
- L. Hinkel, Unit I I&C Foreman
- * A. Kaupa, Radiation Safety and Chemistry Engineer
- * J. Lemons, General Foreman - Nuclear
- * E. Reimer, Plant Health Physicist
- P. Rizzo, General Foreman - I&C
- * L. Russell, Chief Engineer
- * J. Speciale, Rad-Chem Foreman
- * L. Sundquist, Supervisor, Engineering QA
- C. Toth, Training Specialist
- * L. Wenger, Performance Engineer (FCRC)
- * R. Wenderlich, Training Coordinator
- J. Yoe, Training Specialist

* denotes those persons in attendance at the exit interview on October 5, 1979

2. Licensee Action on Previous Inspection Findings

(Closed) Infraction (318/79-06-01):

- a. The inspector verified that the licensee has implemented a new monthly surveillance test procedure which requires that all locked valves associated with the locked valve list of the "Pre-Startup Checkoff" which are accessible during plant operation are physically checked to be in the correct position. In addition, the procedure requires a check of the valve locking device and the green/red tags which indicate required position.
- b. To more positively ensure the proper positioning of locked valves prior to returning from a cold shutdown condition, the licensee has issued procedures which required that locked valve line-ups be performed twice by separate individuals.

(Closed) Infraction (317/79-11-01):

- a. The inspector verified that the licensee's newly instituted monthly Quality Assurance surveillance of valve line-ups was performed on August 25, 1979, resulting in no identified discrepancies.
- b. The inspector verified that the licensee is performing the newly instituted monthly surveillance test STP-0-93-1, "Locked Valve Verification" of accessible valves to insure locked valves in safety related systems are properly lined up initially and remain lined up and locked during operation. Tests performed on the following dates indicated no discrepancies: June 6, July 7, August 8 and September 8, 1978.

(Closed) Unresolved Item (317/78-38-03, 318/78-34-02):

The inspector verified that the licensee revised Administrative Procedure CCI-211B, March 1, 1979, "Preventive Maintenance Program" to include requirements that the Senior Control Room Operator (SCRO) authorize permission to perform a PM and acknowledge completion thereof.

(Closed) Unresolved Item (317/79-12-02, 318/79-09-02):

The inspector verified by review of test data that Surveillance Test Procedure STP-M-12 and M-13, "Snubber Inspection Accessible and Inaccessible" has been revised on September 26, 1979 to include specific instructions for leak identification and applicable actions to be taken.

(Closed) Unresolved Item (317/79-12-04):

The inspector reviewed Maintenance Request (MR-M-79-486) and verified that the reservoir support bracket had been reinstalled.

(Closed) Unresolved Item (317/78-25-13, 318/78-19-13):

The inspector verified that Surveillance Test Procedure, STPM-471, "Air Lock Door Operability and Leak Rate Test, April 25, 1979 has been revised to include requirements for the measurement of pressure decay by minimum deflection on the pressure gauge.

(Closed) Unresolved Item (317/78-25-12, 318/78-19-12):

The inspector verified that Surveillance Test Procedure, STPM-171-2 has been revised to eliminate the \pm negative pressure data, and has incorporated 15 psig +5-0 as the acceptance criteria, and requires that the absolute pressure be recorded on the data sheet.

(Closed) Unresolved Item (317/78-25-14, 318/78-19-14):

The inspector verified that Surveillance Test Procedure M-571, "Local Leak Rate Test", September 3, 1979, has been revised to include requirements that both sides of CIV's being tested be drained and valves lined up.

(Closed) Unresolved Item (317/78-09-02):

The inspector verified that Surveillance Test Procedure, STP-1-T-3, "Containment End Anchorage Concrete Surveillance", has been revised to include acceptance criteria for new cracks and requirements for comparison of previous data for all cracks.

3. General Training

References:

- CCI 600B, Onsite Training of Calvert Cliffs, dated June 8, 1979
- CCI-602D, Calvert Cliffs Nuclear Power Plant General Orientation Training, dated June 23, 1977
- CCI-611C, Site Emergency Plan Training, Change 2, dated April 21, 1977
- CCI-133B, Calvert Cliffs Fire Protection Plan, dated May 21, 1979

a. Program Definition

The inspector reviewed the referenced procedures with respect to the program definition requirements of: 10 CFR 50 Appendix B, Criterion II; 10 CFR 19.12; 10 CFR 73.50; and ANSI N18.1. The referenced procedures set forth formal training programs for: new employees; temporary/maintenance of service personnel; operations personnel; technicians; and craft personnel.

These programs establish training which covers: administrative controls and procedures; radiological health and safety; controlled access and security; industrial safety training; respirator protection; quality assurance training; fire training; and emergency plan training. Formal training is also provided for female employees on the contents of Appendix A to Regulatory Guide 8.13.

During the review of the station fire brigade training, the inspector noted that Section 6.4.2 of the Unit One and Unit Two Technical Specifications references Section 27 of the NFPA Code 1976. Further investigation revealed that the latest revision of Section 27 is 1975.

It appears that the erroneous reference resulted from a typographical error in a request for amendment to the Technical Specifications. The item is considered unresolved pending correction of Technical Specifications and subsequent review by NRC Region I. (317/79-17-01, 318/79-14-01)

b. Program Participation

The inspector reviewed the licensee's records to assure that the required training had been given. In addition, the inspector conducted interviews with certain of those individuals whose records were reviewed. The interviews were to verify that: the scope of the training was similar to that contained in the licensee's records; the training as conducted was meaningful to those attending; and, that the areas presented were covered accurately and sufficiently from the participants' point of view. Interviews were conducted for personnel listed below:

- one employee with six years experience
- one temporary employee
- one employee with less than one years experience
- two female employees

No items of noncompliance were identified.

4. Technician Training

References:

- CCI-603B, Operator Training, dated January 12, 1975
- CCI-606B, Maintenance Personnel Training, dated June 29, 1979
- CCI-607C, Radiation Safety and Chemistry Personnel Training, dated November 21, 1978
- CCI-613, Qualification of Test and Inspection Personnel, dated November 20, 1978

a. Program Definition

The inspector reviewed the referenced procedures with respect to the program definition requirements of: 10 CFR 50 Appendix B, Criterion II, ANSI N18.1; and ANSI N45.2.6. The referenced procedures set forth formal training programs for the I&C, maintenance, chemistry, Health Physics, non-licensed operators and quality assurance/quality control personnel. These programs establish training which covers: initial and annual training requirements for on-the-job training, formal technical training commensurate with the job classifications; and, certification procedures to meet ANSI N45.2.6. The inspector identified no items of noncompliance.

b. Program Participation

The inspector reviewed the licensee's records and conducted interviews with selected individuals. The interviews were conducted to ascertain that the documented training had been given and was not directed at determining that the individuals were qualified to perform their assigned tasks.

The following personnel were interviewed:

- one mechanic
- one I&C technician
- one chemistry department technician

The inspectors findings in the mechanical and I&C training were similar to the findings in OAP 20 Audit Number 20-23-79. Specifically, the maintenance of training records in the mechanical maintenance department and the documentation of retraining in the I&C maintenance department were deficient. This item is considered unresolved pending action on the subject OA audit and further review by NRC Region I. (317/79-17-02, 318/79-14-02)

During the review of chemistry training records, the inspector noted that there were two parts to be completed. He further noted that all part one signatures could be waived by the Radiation Safety and Chemistry Engineer based on previous experience. Item number five in part one contains information related specifically to operation at Calvert Cliffs. Discussion with licensee representatives determined that the note in part one was not intended to include item number five. The licensee representative stated that a change would be made to CCI-607C to require specific training for the subjects covered in item five. The licensee representative stated that this change would be in place by December 1, 1979. This item is considered unresolved pending review of the change by NRC Region I. (317/79-17-03, 318/79-14-03)

5. Requalification Training

Reference:

---- CCI-604B, Licensed Operator Training, dated April 11, 1978

a. Program Review

The inspector reviewed the referenced procedure and verified that it complies with the requirements of 10 CFR 55 Appendix A and the Calvert Cliffs accepted Requalification Program and includes the following items:

- an established, planned, continuing lecture schedule;
- documentation of personnel attendance;
- required reactivity control manipulations; (simulator training program)
- discussions/reviews of changes in facility design, procedures, and facility license; and,
- review of abnormal/emergency procedures.

The inspector identified no items of noncompliance.

b. Record Review

The inspector reviewed the records of licensed operator training to verify that the following documentation was present:

- Completed course and yearly examinations with answers;
- Manipulations of controls for reactivity changes required by the program;
- Discussion of emergency/abnormal procedures and responses;
- Results of supervisory evaluations.

c. Findings

The accepted requalification program and the referenced instruction require licensed operators to review design changes and attend a lecture covering the same subject. This lecture is required regardless of the score achieved on the annual requalification examination. The licensee representatives could not supply documentation that all licensed operators had been routed applicable design changes called Facility Change Reviews (FCR's) during the calendar year 1978.

Additionally, when the inspector reviewed the attendance sheet for the subject lecture given on June 7, 14, and 28, 1978, it was noted that only 4 of 37 licensed operators had attended. The Calvert Cliffs requalification program allows those persons missing a given required lecture to complete a comprehensive makeup assignment. The licensee representative stated that the makeup assignment was not completed by all of those persons missing the lecture. The above finding constitutes an apparent item of noncompliance at the deficiency level. (317/79-17-04)

d. Personnel Interviews

The inspector selected and interviewed three licensed personnel who participated in the requalification program. The interviews were directed at obtaining subjective appraisal of the content and effectiveness of the requalification training as presented.

The inspector identified no discrepancies or inconsistencies between the interview results and the licensee's records.

6. Inadvertent Safety System Actuation

Reference:

---- Letter to all PWR's - June 26, 1979, D. G. Eisenhut, Division of Operating Reactors, Office of Nuclear Reactor Regulation

The licensee was informed by letter from the Division of Operating Reactors on August 31, 1979, and requested to submit within 30 days the results of a review of his policies and procedures regarding the testing of safety related systems and the investigation of equipment failures.

The inspector reviewed the licensee's response submitted on September 11, 1979 and judged it inadequate in that certain areas were not addressed as requested.

The inspector discussed this matter with the licensee and stated that the Office of Nuclear Reactor Regulation had informed him of a second letter that will be issued shortly addressing in more detail the same subject which would require an additional response. The inspector stated that the licensee need take no further action at this time pending the issuance of the second letter.

This is an unresolved item pending review and evaluation of the licensee's response to the subsequent letter. (317/79-17-05, 318/79-14-05)

7. In-Office Review of Periodic Reports

The inspector reviewed the Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Monthly Operating Status Report for August 1979 in the Region I office.

The inspector verified that the report included the information required to be reported by Technical Specifications, and that test results and supporting information was consistent with performance specifications. The inspector ascertained that applicable corrective actions taken or planned were adequate for resolution of identified problems and determined whether any information contained in the report should be classified as an abnormal occurrence. The monthly status report was closed out based upon a satisfactory review.

8. Bulletin 79-10

The inspector conducted an independent review of licensee response to IE Bulletin dated May 25, 1979 for the following:

- written response within time period stated in Bulletin;
- inclusion of information requested;
- appropriate copies distributed to onsite management; and,
- information included was accurate.

The inspector identified no items of noncompliance.

9. Unresolved Items

Items about which more information is required to determine acceptability are considered unresolved. Paragraphs 3, 4 and 6 of this report contain unresolved items.

10. Exit Interview

At the conclusion of this inspection, the inspector held a meeting (see detail one for attendees) to discuss the inspection scope and findings. The unresolved items and apparent item of noncompliance were identified.