

BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.

VICE PRESIDENT
SUPPLY

December 28, 1979

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

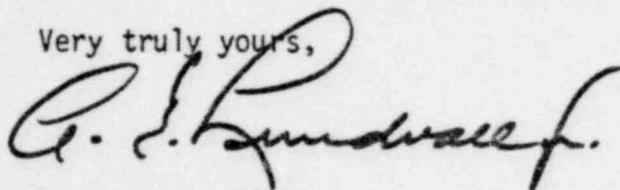
Attention: Mr. Boyce H. Grier, Director

Gentlemen:

This refers to your letter of December 4, 1979, which transmitted a Notice of Violation. This Notice of Violation was based on the Combined Inspection Reports 50-317/79-16 and 50-318/79-13 and was concerned with the installation of a Sleeving Platform that was not fabricated to Safety-Related/Seismic Standards. Enclosure (1) to this letter constitutes a written explanation in reply to this Notice of Violation.

Should you have further questions concerning this reply, we would be pleased to discuss them with you.

Very truly yours,



A. E. Lundvall, Jr.
Vice President-Supply

AEL/JAM/gla

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ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC (IE: REGION I)

LETTER OF DECEMBER 4, 1979

ITEM A

Since the Sleeving Platform was not fabricated as Safety-Related, the corrective action has been not to use it again. Subsequently, a new sleeving platform was designed and fabricated to Seismic I/Safety-Related requirements in 1978. This new platform has already been used for the past three (3) refueling outages. Thus, full compliance has been achieved.

The following comments are made to amplify the inspection review and further explain what lead up to this item of noncompliance. Contrary to the inspector's comment that "Corporate Engineering Department made the determination that the original safety evaluation and determination that the platform need not be safety-related was incorrect," the original evaluation is valid and could have stood as written. Instead, Corporate Engineering superseded the original evaluation with one that called for Seismic I/Safety-Related construction because, through a misunderstanding, it was thought that the platform already met those standards. Unfortunately, the personnel using the platform never received the latter classification and were unaware that it was required to be safety-related until some time after the outage during the review of the Facility Change Request (FCR).

Since it has been almost two (2) years since the incident occurred without a similar recurrence, it is felt that this is not a programmatic weakness. Quality Assurance audits conducted after this incident indicate that this was an isolated event.

Finally, the inspector noted that physical modifications were required to upgrade the platform to a seismic structure. The original platform was left as is and not used again. Thus no modifications will be performed.