

# BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.

VICE PRESIDENT  
SUPPLY

December 11, 1978

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

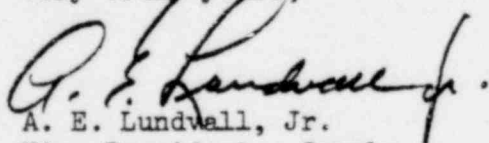
Attention: Eldon J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch

Gentlemen:

This refers to your Inspection Reports 50-317/78-28 and 50-318/78-25, which transmitted certain items of apparent non-compliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to the items noted in Appendix "A" of your letter of November 17, 1978.

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

Very truly yours,

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

AEL/RED/ds

Enclosure

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ENCLOSURE (1)

REPLY TO NRC LETTER DATED NOVEMBER 17, 1978  
NRC INSPECTION REPORT 50-317/78-28 AND 50-318/78-25

A. The changes to OI-20 and OI-8E have now been reviewed by the POSRC and approved by the Chief Engineer. To preclude recurrence of such an event, a memorandum has been issued to all operations personnel to reiterate the importance of the documentation and timely review/approval of procedure changes.

B. TECHNICAL SPECIFICATION LIMITATIONS

Both OP-6 and OP-3 have been updated to include the latest Technical Specification limitations for the Safety Injection Tank nitrogen pressure, Refueling Water Tank temperature and Cold Leg temperature. To preclude the recurrence of such an event, in the future the responsibility to update operations procedures as a result of license amendments will be specifically assigned to an individual on the plant operations staff. Additionally, each time an amendment is issued, a copy of the amendment itself will be used as a checklist to make procedure changes. This checklist will be annotated with the changes made and retained as documentation of the performance of this requirement.

PROCEDURE LOCATION

Copies of Table 1 for OI-8E have been replaced in the Unit 1 and Unit 2 Control Room procedures manual. To preclude recurrence of such an event, a memorandum has been issued to all operations personnel reiterating the importance of having complete procedures available at the location to which they are assigned. When procedures or parts of procedures are removed from the manual to perform the operation at hand, personnel are directed to return them promptly to their proper location after use.

PERIODIC REVIEW OF PROCEDURES

The system by which operations procedures are reviewed is being completely revised to require that every two (2) years each Operating Procedure, Operating Instruction, Emergency Operating Procedure and Abnormal Operating Procedure be reviewed by a licensed operator. Such reviews will be recorded on separate forms which will be retained as documentation of this review. This system will be instituted by January 1, 1979; procedure reviews under this system will be completed by March 31, 1979.