

APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas & Electric Company
P. O. Box 1475
Baltimore, Maryland 21203

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

As a result of the inspection conducted at the Calvert Cliffs Nuclear Power Plant on October 10-13, 1989, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified.

- A. 10 CFR 20.311(b) states in part that "Each shipment of radioactive waste to a licensed land disposal facility must be accompanied by a shipment manifest... the manifest must also indicate as completely as practicable... radionuclide identity and quantity."

Contrary to the above, the licensee made shipments of spent resins to the Barnwell Low-Level Radioactive Waste Disposal Facility on June 21, 1989 (Shipment 89-40) and September 27, 1989 (Shipment 89-65), which specified erroneous quantities for most of the radioisotopes listed, and for the total package activity.

This is a Severity Level IV Violation (Supplement V).

- B. 10 CFR 61.55(a)(8) states in part that for radioactive wastes to be disposed of "(t)he concentration of a radionuclide may be determined by indirect methods such as the use of scaling factors which relate the inferred concentration of one radionuclide to another that is measured... if there is reasonable assurance that the indirect methods can be correlated with actual measurements."

Contrary to the above, the licensee has not taken and analyzed actual plant resin waste streams for scaling factors since February, 1987; and has not taken and analyzed actual plant Dry Active Waste (DAW) streams for scaling factors since February, 1985, but has continued to make spent resin and DAW shipments for disposal (DAW streams were sampled in June 1989, but they had not been analyzed by the time of this inspection).

This is a Severity Level IV Violation (Supplement V).

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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