

OCT 24 1989

Docket No. 50-317  
50-318

Baltimore Gas and Electric Company  
ATTN: Mr. George C. Creel  
Vice President  
Nuclear Energy  
Calvert Cliffs Nuclear Power Plant  
MD Rts 2 & 4, P.O. Box 1535  
Lusby, Maryland 20657

Gentlemen:

Subject: Inspection Nos. 50-317/89-16 and 50-318/89-17

This refers to your letter dated September 14, 1989, in response to our letter dated August 15, 1989.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Ronald R. Bellamy

Ronald R. Bellamy, Chief  
Facilities Radiological Safety  
and Safeguards Branch  
Division of Radiation Safety  
and Safeguards

cc w/encl:

W. J. Lippold, General Supervisor, Technical Services Engineering  
T. Maquette, Administrator, Nuclear Evaluations  
J. Lemons, Manager, Nuclear Outage Management  
L. Russell, Manager, Calvert Cliffs Nuclear Power Plant  
J. Walter, Engineering Division, Public Service Commission of Maryland  
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Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of Maryland (2)

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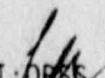
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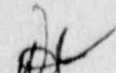
bcc w/encl:  
Region I Docket Room (with concurrences)  
Management Assistant, DRMA (w/o encl)  
J. Wiggins, DRP  
L. Tripp, DRP  
D. Limroth, DRP  
K. Lathrop, DRP  
S. McNeil, NRR  
PAO (24) SALP Reports Only  
J. Dyer, EDO

CG  
RI:DRSS  
Gordon/mk


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RI:DRSS  
Bellamy

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CHARLES CENTER · P. O. BOX 1475 · BALTIMORE, MARYLAND 21203

GEORGE C. CREEL  
VICE PRESIDENT  
NUCLEAR ENERGY  
(301) 260-4455

September 14, 1989

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Response to NRC Combined Inspection Report Nos. 50-317/89-16;  
50-318/89-17

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Gentlemen:

This transmits our response to Appendix A of the subject inspection report, which cites a violation of NRC requirements concerning adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition. Enclosure (1) details our response.

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

Very truly yours,

GCC/DLS/dlm

Enclosure

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
R. A. Capra, NRC  
S. A. McNeil, NRC  
**W. T. Russell, NRC**  
V. L. Pritchett, NRC  
T. Magette, DNR

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## ENCLOSURE (1)

### **REPLY TO NRC INSPECTION REPORT 50-317/89-16; 50-318/89-17**

#### VIOLATION

"10 CFR 50.47(b)(9) requires that 'Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.' Contrary to the above, the Interim Radiological Assessment Director in the Control Room was not able to perform dose assessment from radiological releases which may result from steam generator tube rupture due to lack of a procedure or training."

#### REASON FOR THE VIOLATION

This violation occurred because the development of our Emergency Response Plan and Implementing Procedures did not consider the radiological assessment of the postulated walk-through scenario to be an Interim Radiological Assessment Director function. A fuel failure of the magnitude given by the scenario, plus a simultaneous Steam Generator tube rupture and loss of the condenser (causing all activity to be released through atmospheric dump valves), was not postulated within the interim response phase. Hence, it was assumed that adequate time would be available to augment the interim staff and to implement Main Steam Radioactivity Release Estimate Procedure (ERPIP 4.1.3.6) in the Technical Support Center.

#### CORRECTIVE STEPS

Both of our Units are shut down. We have initiated development of an interim response phase methodology for implementation in the Control Room for an unmonitored release of radioactivity from the steam system. If either Unit operates in **MODE 1** (Power Operation) before development of this methodology is complete, a Radiological Assessment Director will be staffed on a 24-hour basis until development is complete.

#### FULL COMPLIANCE

With the action plan discussed above, we are in full compliance now.