

BALTIMORE GAS AND ELECTRIC COMPANY

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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

May 9, 1980

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

Docket Nos. 50-317
50-318

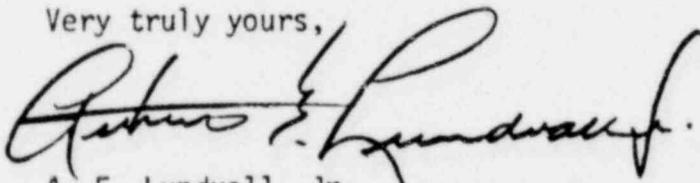
ATTENTION: Mr. Boyce H. Grier, Director

Gentlemen:

This refers to your Inspection Report 50-317/80-02; 50-318/80-02, which transmitted items of apparent noncompliance 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 April 17, 1980. Additionally, enclosure (2) to this letter addresses those areas for which you expressed concern related to the control of radiation and facility safety.

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/gla

ENCLOSURE (1)

REPLY TO IE LETTER OF APRIL 17, 1980
APPENDIX A, NOTICE OF VIOLATION

Item A.1.a

On February 11, 1980, Calvert Cliffs declared a "Plant Emergency" condition due to radiation alarms received on Unit 1 Waste Process Area Vent, Unit 2 Waste Process Area Vent, and Unit 2 Main Vent Radiogas Radiation Monitors. Notification was performed by plant personnel utilizing Figure 1B (Communications - Notification - Plant and Local Emergency) of the Site Emergency Plan Implementation Procedures (SEPIP), Revision 9. As cited in this item, SEPIP Section I.B.2.a.3 referenced Figure 1A to be used for notification in Plant and Local Emergency conditions, an obvious typographical error, as Figure 1A deals with Site and General Emergency conditions only. It is clear by examination of Figures 1A and 1B, and the source document (the Site Emergency Plan) that Figure 1B was appropriate for use during the February 11, 1980, event. The training given to our Site Emergency Director(s) in the proper notification procedures and their in-depth familiarity of these procedures inherently precipitated the use of the proper notification scheme. As the event was declared a Plant Emergency, notification of USNRC Office of I&E was not required at this time. In light of the fact that proper notification was made for the class of emergency declared, it is considered that on February 11, 1980, we were in compliance with Technical Specification 6.8.1 on this item. We believe that it is poor practice to insist that plant personnel comply with a procedural step when it is known to be in error. Admittedly we were remiss in not correcting that error promptly.

To prevent future misinterpretation by reviewers of the SEPIP and others who would utilize these procedures, the typographical error has been corrected in a recent revision (Revision 10) to Section I.B.2.a.3 to read Figure 1B vice Figure 1A for Plant and Local Emergency conditions. Furthermore, the NRC requirements for notification of significant events as published in the Federal Register on February 29, 1980, was implemented on March 4, 1980, and requires all future Plant and Local Emergency conditions to be reported in the manner prescribed therein.

Item A.1.b(1)

This item refers to required action to be taken during Site and General Emergency conditions only; Section I.B.2.b and the first note in Section IV, Page A-12 of SEPIP A, clearly delineates these requirements. As stated in response to Item A.1.a above, a Plant Emergency condition was declared; therefore, requirements in Section IV were not applicable as required actions. It is therefore considered that we were in compliance with Technical Specification 6.8.1 on this item.

ENCLOSURE (1)

REPLY TO IE LETTER OF APRIL 17, 1980
APPENDIX A, NOTICE OF VIOLATION

To comply with the Federal Register notice of February 29, 1980, regarding Notification of Significant Events, we established procedural requirements on March 13, 1980, which include provisions for making specific estimates of off-site dose for unplanned releases to Plant Emergency conditions as described in this item.

Item A.1.b(2)

The significance of individuals entering potential or known high airborne radiation areas without suitable respiratory protection is of concern to us as well. As stated in this item, proper briefing was not accomplished in this case, which, in turn, contributed to the health physics practices described. It may be noted that in Plant Emergency conditions the activation of Emergency Teams are not required -- this is required by Site and General Emergency conditions (Section IV of SEPIP A). Nevertheless, plant procedures require briefing (notification of hazards) of personnel to perform tasks under radiological conditions and include requirements of specific protective measures. These measures include the use of respiratory protection, when conditions deem it necessary.

Actions taken to prevent recurrence of this item include retraining of all Radiation Safety Technicians in the required actions to be taken under emergency conditions. This includes training in emergency reentry procedures and requirements established in Revision 8 to the SEPIP regarding briefing of Emergency Radiation Teams. It is expected that compliance with Technical Specification 6.8.1 for this item will be accomplished by May 12, 1980.

Item B (paragraphs 1, 2, and 3)

As of April 18, 1980, we have increased the staffing of each operations shift to include one additional Senior Control Room Operator (SCRO); we believe that the augmentation of the shift organization by the addition of such an experienced, knowledgeable individual will greatly benefit the ability of the Operations Unit to operate the plant in a safe, efficient manner. During routine operations, the second SCRO will function to aid the Shift Supervisor by acting as a work leader for plant evolutions performed outside the Control Room. Specifically, this SCRO has been charged with the responsibility of insuring that procedures are used properly in the plant, that the procedures used are correct, and that as the need for procedure changes is recognized, they are instituted expeditiously.

As set forth in the "details" section of your report, the basic reason for valve manipulation on the CVCS Ion Exchangers was to preclude the possibility of introducing air into the Reactor Coolant System when the associated instrument air header was pressurized. During the second week of April, 1980, a plant modification was completed which substitutes nitrogen for air as a resin fluffing and transfer agent. Consequently, the ion exchangers will no longer be isolated and vented each time the header is pressurized. This greatly reduces the need for valve manipulations in this area, thereby reducing the possibility of radioactive gas release from this source in the future.

ENCLOSURE (2)

ASSESSMENT OF MANAGEMENT CONTROLS FOR AREAS RELATED TO RADIATION AND FACILITY SAFETY

EMERGENCY PLAN AND IMPLEMENTING PROCEDURES

Revision 10 to the Site Emergency Plan Implementing Procedures (SEPIP) was issued on February 27, 1980. This revision substantially modified the applicable procedures to more specifically address the relative hazard involved; in particular, more detail was provided regarding conditions categorized as Plant or Local Emergencies. The changes made under this revision also improved the usability of the affected procedures.

FACILITY HOUSEKEEPING

As of March 12, 1980, Calvert Cliffs Instruction 200, "Maintenance Requests", was changed to require that the "lead man" on each job verify by his signature that post-work clean-up has been completed before any maintenance request is closed out. The institution of this mechanism assigns responsibility for post-work clean-up and consequently provides a significant improvement in the ability to control plant housekeeping.

It has been our practice to periodically check housekeeping standards by requiring that a tour of safety-related areas be conducted by a group composed of various supervisors from all plant units. In the past, this tour did not include high radiation areas; however, since March of this year, high radiation areas have been included within the scope of this tour.

REPAIR OF RADIATION MEASURING INSTRUMENTS

All Radiation Monitoring System channel indicators which are required for monitoring releases to the environment were in service. The instruments which were out of service either have backup indication from the main vent or are removed from service when at power; i.e., certain area radiation monitors. The Waste Gas Discharge channel which was out of service was being repaired for return to service prior to any discharge of waste gas from the waste gas decay tanks.

A trend recorder was out of service at the time of this incident as noted. Troubleshooting activities were in progress the day of this release (February 11, 1980). The repairs were completed on February 12, 1980. The priorities for repair are assigned at the time a malfunction is detected. These may be reassigned when items of greater safety significance are detected. It should be noted that Main Vent particulate and gaseous activity levels are also available on the computer log typewriter as a backup to this recorder. Consequently, we feel that repair efforts made at the time were reasonable.

REPAIR OF FACILITY VALVE POSITION INDICATORS

The importance of proper prioritization of maintenance requests regarding valve position indicators for reach-rod operated manual valves in systems containing radioactive material has been emphasized to the responsible maintenance unit foreman and to the appropriate operations unit personnel. This action is complete.

ENCLOSURE (2)

ASSESSMENT OF MANAGEMENT CONTROLS FOR AREAS RELATED
TO RADIATION AND FACILITY SAFETY

NOTIFICATION PROCEDURES

We have instituted administrative measures to report to the NRC Operations Center events which are categorized in the recently published section 50.72 of 10 CFR 50 (published on February 29, 1980). Item (a)(8) of this section reads:

"Any accidental, unplanned or uncontrolled radioactive release. (Normal or expected release from maintenance or other operational activities are not included.)"

Additionally, as of April 25, 1980, we have reached an agreement with the Calvert County Board of Commissioners to report to the Calvert Control Center "all unplanned and uncontrolled radiological releases from Calvert Cliffs reported to the Nuclear Regulatory Commission".

We believe that the recent institution of these reporting mechanisms should satisfy your concerns in this area.

REVIEW OF RADIOACTIVE RELEASES

In order to strengthen our control and awareness of Main Vent radiation releases at levels below the alarm setpoint (~ 8% of Technical Specification limits), we have implemented a program which will cause a detailed review to be made of the data associated with the Main Vent radiation monitors. This data is automatically logged on the computer log typewriter which records the peak and sum counts detected during each hour of the day for the gaseous and particulate monitors. The data review will be conducted weekly by a member of the Radiation Safety staff to ensure that unauthorized releases are not made and that releases which do occur are consistent with ALARA philosophy. We believe that our present procedures and practices provide adequate control and awareness to Main Vent radiation releases above the alarm setpoint levels.