

APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company

Docket Nos. 50-317
50-318

Based on the results of an NRC inspection conducted on July 28 - August 1, 1980, it appears that several of your activities were not conducted in full compliance with conditions of your NRC Facility License Nos. DPR-53 and DPR-69 as indicated below. These items are deficiencies.

- A. Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented and maintained...". Quality Assurance procedure QAP-31, Revision 6, May 9, 1980, paragraph 5.1 states in part, "Procedures shall comply with the following: ...applicable subsections of 5.0 and 6.0 of ANSI N18.7 (issued December 1972)".

ANSI N18.7-1972, 5.4 states in part, "procedures for a nuclear power plant reflect the conditions existing at the time the procedures are written." Additionally, paragraph 5.1.2 states in part, "...the operator to have committed the procedural steps to memory...copies of all procedures shall be available to appropriate members of the plant staff...".

Contrary to the above, the alarm procedure did not reflect current plant conditions in that procedure "Secondary CEA Deviation +4"" was not the +4" or the alarm window. Operators were not aware of the procedure change or that the actual setpoint changed. Additionally, the revised Secondary CEA Deviation Alarm procedure had not been incorporated in the Shift Supervisor's controlled file. Further, the controlled files in the control room contained superseded CEA Deviation Alarm procedures as well as the current revisions.

- B. 10 CFR 50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures,...of a type appropriate to the circumstances...".

Contrary to the above, procedures EOP-11, Revision 9, and IC-06, Revision, were inadequate in that EOP-11 did not reflect prior changes to the Secondary CEA Position Deviation alarm setpoint and status alarm window and IC-06 did not reflect the correct setpoints for the No. 11B Reactor Coolant Pump Seal Temperature High Pressure.

- C. Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, November, 1972...". Paragraph I of the Appendix states in part, "Maintenance...should be properly preplanned and performed in accordance with written procedures,...".

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The following are examples of instances where plant written procedures and administrative policies were either improperly or inadequately implemented concerning maintenance records:

- (1) Plant Procedure CCI 201B, "Calvert Cliffs Nuclear Power Plant Maintenance Procedures", paragraph VII.D requires, in part, "Completed procedures will be reviewed by the cognizant Assistant General Foreman. This review shall be all inclusive with particular attention to acceptance criteria and post maintenance testing...". Further, CCI 201B, attachment (2), "Calvert Cliffs Nuclear Power Plant Maintenance Procedure Cover Sheet" requires the signature of the Assistant General Foreman to document this review.

Contrary to the above, the following completed maintenance procedures did not have the signature verifying the review by the Assistant General Foreman.

- Procedure GEN-4, Valve Maintenance, performed March 19-April 27, 1979 for MR-0-79-957, Repack of Letdown Heat Exchanger Outlet Valve, 1-CVC-110 Q;
- Procedure CVCS-11, Charging Pump Cartridge Type Packing Replacement, performed February 15, 1980 for MR-0-80-452, Repack of No. 12 Charging Pump;
- Procedure RV-25, CEDM Housing Vent Procedure, performed February 9, 1980 for MR-M-79-567, Vent of All CEDM's.

Further examples are detailed in the enclosed inspection report.

- (2) CCI-214A, "Maintenance Records", paragraph IV.A requires, in part, "Maintenance records implemented by a Maintenance Request (MR) are reviewed, filed and retained with the MR to form a "work package". Such records include Maintenance Procedures (MP's)...CCI-107 forms...Upon final review by the AGF, the completed work package is submitted... for temporary storage and transfer to the plant history file...".

Contrary to the above, the following completed maintenance procedures were not placed in the "work package" record with their associated MR:

- Procedure RCS-14, RCP Seal Disassembly Procedure performed January 3-17, 1980 for MR-M-79-2452, Disassemble and Inspect Reactor Coolant Pump Seal No. 7002;
- Procedure INSP-11, Visual Examination of Steam Generator Secondary Side performed April, 1979 for MR-M-79-062, Inspection of SG No. 12 Secondary Side.

- (3) CCI-107D, "Area and System Cleanliness Requirements", paragraph VI.C.1 requires that "The cognizant AGF shall ensure area cleanliness requirements are established prior to opening safety related fluid systems requiring Class II clean areas for maintenance evaluations by completing on attachment 4."

CCI-107D, paragraph XI.2 states in part "Completed attachment 7...4 shall be filed with their associated completed maintenance procedure or MR and retained in accordance with...CCI-214."

Contrary to the above, the following completed MR's did not have their associated cleanliness maintenance record (CCI 107D Attachment (4)) included in the "work package":

- MR-M-78-17, Replace Valve 1-CVC-105
- MR-O-80-1116, Repack No. 21 Charging Pump
- MR-M-80-2023, Replace Spare Reactor Coolant Pump Seal

Further examples are detailed in the enclosed inspection report.