

BALTIMORE GAS AND ELECTRIC COMPANY

P. O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

February 17, 1981

Mr. D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Calvert Cliffs Nuclear Power Plant
Units No. 1 and 2, Docket Nos. 50-317
and 50-318
10 CFR 50.72 Dedicated Telephone Reporting
Requirements

Dear Mr. Eisenhut:

On February 29, 1980, the Commission amended its regulations by adding a new section 50.72 to require that each facility licensed under 10 CFR 50.21 and 10 CFR 50.22 notify the NRC Operations Center as soon as possible and in all cases within one hour of the occurrence of any of twelve types of significant events. Since the dedicated telephone was installed, Calvert Cliffs has made approximately ninety dedicated telephone reports pursuant to this regulation. Many of these reports were made as a result of overly conservative interpretations of the rather general 50.72 reporting requirements by operating personnel. To reduce the number of unnecessary reports, site specific guidelines have been developed which serve to clarify the 50.72 reporting requirements as they apply to Calvert Cliffs. These guidelines have been incorporated into Calvert Cliffs Instruction 118, Reporting Requirements. A copy of the applicable section of this instruction describing the guidelines we will now be following is enclosed for your information.

We believe, the guidelines are consistent with the purpose of the regulation which requires reporting only significant events. In addition, our objective in attempting to reduce the number of unnecessary dedicated telephone reports is part of our continuing efforts to relieve the Shift Supervisor and other operations shift personnel of administrative burdens. However, as in the past, operations personnel will continue to be encouraged to make reports if any doubt exists as to the reportability of specific event.

Very truly yours,

A. E. Lundvall Jr.

A001
5
1/1

Enclosure

8102 200464

ENCLOSURE 1

V. DEDICATED PHONE REPORTS

Per the requirements of 10 CFR 50.72 the NRC Operations Center shall be notified of the following events within one hour of occurrence.

- (1) Any event requiring initiation of the licensee's emergency plan or any section of that plan.

- NOTE -

This item should be reported only if an Unusual Event or higher EAL is declared. Actions taken in order to assess if an EAL has been reached do not constitute implementation of the emergency plan.

- (2) The exceeding of any Technical Specification Safety Limit.
- (3) Any event that results in the nuclear power plant not being in a controlled or expected condition while operating or shutdown.

- NOTE -

Since our plant procedures address analyzed plant conditions, they are in that sense "expected".

This item should be reported whenever plant conditions are such that they cannot be controlled by our emergency or abnormal operating procedures (one example of this condition might be a total loss of heat sink).

- (4) Any act that threatens the safety of the nuclear power plant or site personnel, or the security of special nuclear material, including instances of sabotage or attempted sabotage.

- NOTE -

This item should be reported if an "act" is committed by an individual or group of individuals against the plant or plant personnel.

- (5) Any event requiring initiation of shutdown of the nuclear power plant in accordance with Technical Specification Limiting Conditions for Operation.

- NOTE -

This item should be reported when the unit is placed in Mode 2.

- (6) Personnel error or procedural inadequacy which, during normal operations, anticipated operational occurrences, or accident conditions, prevents or could prevent, by itself, the fulfilment of the safety function of those structures, systems and components important to safety that are needed to (i) shutdown the reactor safely and maintain it in a safe shutdown condition or (ii) remove residual heat following reactor shutdown, or (iii) limit the release of radioactive material to acceptable levels or reduce the potential for such release.

- NOTE -

This item should be reported if the personnel or procedure inadequacy "by itself" results in a "loss of safety function" such as disabling both redundant components or trains of safety features or disabling both auxiliary feedwater trains.

- (7) Any event resulting in manual or automatic actuation of Engineered Safety Features including the Reactor Protective System.

- NOTE -

Inadvertent actuations of ESFAS or RPS should also be reported under this item. Planned actuations such as Surveillance Testing should not be reported.

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

- NOTE -

For gaseous activity, this item should be reported anytime either main vent monitor count rate increases to a count rate equivalent to 25% of the limits specified in Appendix B Technical Specification 2.3.B.1.

if the alarms and increases in count rates cannot be attributed to maintenance or operational activities in progress such as Reactor Coolant diversion.

- (9) Any fatality or serious injury occurring on the site and requiring transport to an offsite medical facility for treatment.

- NOTE -

This item should be reported anytime an emergency vehicle (ambulance) is required for transport of a victim of fatality or serious injury. Such transport of individuals taken ill on-site need not be reported. Do not report the relatively minor injuries which we transport ourselves (such as eye injuries) as a precautionary measure.

- (10) Any serious personnel radioactive contamination requiring extensive onsite decontamination or outside assistance.

- NOTE -

This item would include any decontamination effort which goes beyond the conventional use of soap and water (such as the use of chemical agents) or requiring off-site treatment.

- (11) Any event meeting the criteria of 10 CFR 20.403 for notification.

- NOTE -

This report should be made if an incident occurs involving radioactive material which causes or threatens to cause any of the following:

1. An individual receives 25 REM whole body, 150 REM to the skin, or 375 REM to the extremities.
 2. A release of radioactive material which if averaged over 24 hours exceeds 5000 times the limits of Part 20, App. B, Table 2.
 3. A loss of one working week or more of facility operation.
 4. Damage to property in excess of \$200,000.
- (12) Strikes of operating employees or security guards, or honoring of picket lines by these employees.