BALTIMORE
GAS AND
ELECTRIC

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

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

April 6, 1981

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

ATTENTION: Richard R. Keimig, Chief
Projects Branch #2, Division
of Resident and Project Inspection

Gentlemen:

This refers to your Inspection Report 50-317/81-02; 50-318/81-02, which transmitted one item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to that item in your letter of March 12, 1981.

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

Very truly yours,

Arthur E. Lundvall

Vice President-Supply

AEL/RED/gla

Enclosure (1)

8105110591

STATE OF MARYLAND:
: TO WIT:
CITY OF BALTIMORE:

Arthur E. Lundvall, Jr., being duly sworn states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements are true and correct to the best of his knowledge, information and belief, and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:

Ruth F. Trees
Notary Public

My Commission Expires: July 1, 1982

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Director, Office of Inspection & Enforcement

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/81-02; 50-318/81-02

The system used to classify equipment as safety-related or non-safety related is controlled by procedures approved under the BG&E Quality Assurance Program, specifically, Quality Assurance Procedure #28 and Electric Engineering Department Procedure #4. The Hydrogen Analyzer System was classified as non-safety related on December 4, 1978, using this system, which requires a documented evaluation of the function of the equipment being classified with regard to each of the three criteria for determining safety-related equipment. The evaluation concluded that none of the criteria were met and that the Hydrogen Analyzer System should, therefore, be non-safety related; this was approved and documented as required by procedures. Obviously the first two criteria (involving reactor coolant pressure boundary and reactor shutdown) are not in question. The third criteria involves equipment "necessary to ensure the capability to prevent or mitigate the consequences of an accident . . .", the rationale for determining that this criteria was not met was as follows:

1. The system is used only to provide information to the operator and performs no control function. The function which can prevent or mitigate the consequences of an accident is the starting of the hydrogen recombiners. This is done by the operator by procedure following a LOCA based on events and time following the accident, without regard to the reading of the analyzer. Proper operation of the recombiners is determined by monitoring the electric current supplied to it. Each hydrogen recombiner provides 100% post-LOCA hydrogen removal capacity, as does the hydrogen purge system.

2. Since no control function is involved, the hydrogen analyzer is considered to be post-accident monitoring instrumentation. Guidance on post-accident monitoring instrumentation at the time was limited to the ten (10) instrument functions included in Technical Specifications Table 3.3-10. General policy has been to limit safety-related post-accident monitoring instrumentation to those instruments.

As indicated above, existing procedures for the operation of hydrogen control systems are based on original plant design criteria. These criteria and the supporting analyses did not require the use of the Hydrogen Analyzer as part of hydrogen control measures. As stated in the inspector's report, the Q-List Classification in question was considered as an item, ". . .of a nature which may not be in accord with current NRC positions . . .". This violation was issued based on a comparison of original plant analyses with NRC positions which have evolved since the TMI-2 incident. We recognize that these positions have changed since the original plant design analyses were performed and have

initiated a review to assess our current policies on post-accident monitoring instrumentation based on post-TMI information and recently issued regulatory guidance. This review is scheduled to be completed by the end of this year. Interim policy on new instruments has been conservative --- the wide range hydrogen analyzer system being installed to meet the NUREG-0578 and NUREG-0737 requirements is being treated as safety-related.