

APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company
Calvert Cliffs Unit 1 and 2

Docket Nos. 50-317; 50-318
License Nos. DPR-53; DPR-69

As a result of the inspection conducted on January 5 - February 1, 1981 and in accordance with the interim enforcement policy, 45 FR 66754 (October 7, 1980) the following violations were identified.

10 CFR 50, Appendix B, Criterion II states in part:

"... The applicant shall establish at the earliest practicable time, consistent with the schedule for accomplishing the activities, a quality assurance program which complies with the requirements of this appendix. This program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures, or instructions. The applicant shall identify the structures, systems and components to be covered by the quality assurance program..."

The Quality Assurance Program for the Operations Phase (FSAR Chapter 1C) states in 1C.2, Quality Assurance Program:

"The Baltimore Gas and Electric Company's quality assurance program for the Calvert Cliffs Nuclear Power Plant is applied to structures, systems, components, and activities which have been designated Safety Related because they prevent or mitigate the consequences of postulated accidents which could cause undue risk to the health or safety of the public..."

Controls have been established for specifying on a Quality List (Q List) and Instrument Index all structures, systems, or components that are subject to the requirements of the quality assurance program and for making revisions to the Q-List..."

The Calvert Cliffs Q-List, states in part:

"To promulgate a list of safety related items for Calvert Cliffs Nuclear Power Plant in accordance with QAP-28 (reference 3.1) and EEP-4 (reference 3.2). This document shall provide a means of determining those plant structures, systems and components which have an effect on nuclear safety..."

"Safety related items as defined as:

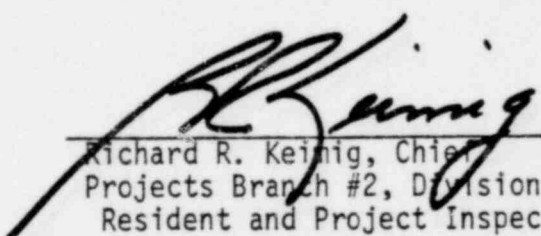
- A. Structures, systems, components, materials, or services named on the Q-List as necessary to ensure:
- (1) The integrity of the reactor coolant pressure boundary,
 - (2) The capability to shut down the reactor and maintain it in a safe condition, or
 - (3) The capability to prevent or mitigate the consequences of an accident which could result in potential off-site exposures to individuals in excess of exposures specified in 10 CFR, Part 20..."

Contrary to the above, the Hydrogen Analyzer System was deleted from the Q List on December 4, 1978, thereby removing Quality Assurance Program coverage over a system necessary to prevent or mitigate an accident which could result in potential off-site exposures in excess of those specified in 10 CFR Part 20; in that the Hydrogen Analyzer is required for measuring hydrogen concentration within the containment so that the hydrogen concentration can be kept below the level at which combination with oxygen could result in a breach of containment during post-LOCA conditions.

This is a Severity Level V Violation (Supplement I) applicable to DPR-53 and DPR-69.

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is hereby required to submit to this office within twenty-five days of the date of this notice, a written statement or explanation in reply, including: (1) Corrective steps which have been taken and the results achieved (2) Corrective steps which will be taken to avoid further violation and (3) the date when full compliance will be achieved. Under the authority of section 182 of the Atomic Energy Act of 1954, as amended this response shall be submitted under oath or affirmation.

Dated MAR 12 1981


Richard R. Keinig, Chief
Projects Branch #2, Division of
Resident and Project Inspection