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ARTHUR E. LUNDVALL JR.
VICE PRESIDENT
SUPPLY

April 3, 1981

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

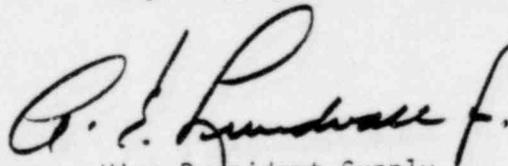
ATTENTION: Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

Gentlemen:

This refers to your Inspection Report 50-317/81-03; 50-318/81-03, 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 13, 1981.

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

Very truly yours,


Vice President-Supply

AEL/RED/gla

Enclosure (1)

81 05270169

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/81-03; 50-318/81-03

On December 23, 1980, CCI-117A entitled, "Lifted Wire and Temporary Jumper Log", was approved for use. This CCI incorporated the requirements of NUREG-0737 for independent verification when installing and removing lifted leads and jumpers. However, through an oversight, the documentation controlling approximately twelve (12) outstanding lifted wires and temporary jumpers was not updated to reflect the new requirements and an outdated copy of the CCI was still located in the front of the Lifted Wire and Temporary Jumper Log. Consequently, on January 16, 1981, a jumper affecting steam line drain number four, an item of no safety significance, was properly restored by a qualified technician without the required independent verification. Immediately upon notification of the procedure violation by the Resident NRC Inspector, the out-of-date CCI was replaced with a current revision and all Outstanding Lifted Wire and Temporary Jumper Log Sheets were updated to require an independent verification when they are restored. Additionally, CCI-100, "Calvert Cliffs Nuclear Power Plant Instructions and Notices", is being revised to add the Lifted Wire and Jumper Log to the controlled distribution for CCI-117. The above actions will prevent any further violations.

The jumper in question in no way affected the safe operation of the reactor and the health and safety of the public was not affected by the administrative oversight. Therefore, we feel that a Level V violation is inappropriate, since Severity Level V violations are for infractions of, ". . . other than minor safety significance . . .", and this infraction involved an item of no safety significance. Consequently, it is requested that this categorization be reconsidered; it is our opinion that it would more appropriately be a Severity Level VI violation.