

APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company
Calvert Cliffs, Units 1 and 2
License Nos. DPR-53
DPR-69

Docket Nos. 50-317
50-318

As a result of the inspection conducted on February 2-March 1, 1981, and in accordance with the interim enforcement policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- I. Limiting Condition For Operation Technical Specification 3.7.1.2, Auxiliary Feedwater System, states:

3.7.1.2 At least two steam turbine driven generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

With one auxiliary feedwater pump inoperable, restore at least two auxiliary feedwater pumps to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours."

Technical Specification 1.6 states in part:

"A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified functions."

Technical Specification Basis 3/4.7.2, AUXILIARY FEEDWATER SYSTEM, states:

"The OPERABILITY of the auxiliary feedwater system ensures that the Reactor Coolant System can be cooled down to less than 300°F from normal operating conditions in the event of a total loss of offsite power.

Each steam driven auxiliary feedwater pump is capable of delivering a total feedwater flow of 700 gpm at a Total Dynamic Head of 2490 ft to the entrance of the steam generators. This capacity is sufficient to ensure that adequate feedwater flow is available to remove decay heat and reduce the Reactor Coolant System temperature to less than 300°F when the shutdown cooling system may be placed into operation."

Limiting Condition For Operation Technical Specification 3.0.3 states:

"In the event a Limiting Condition For Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the facility shall be placed in at

8108030209 810715
PDR ADOCK 05000317
Q PDR

Appendix A

least HOT STANDBY within 1 hour and in COLD SHUTDOWN within the following 30 hours unless corrective measures are completed that permit operation under the permissible ACTION statement for the specified time interval as measured from initial discovery. Exceptions to these requirements shall be stated in the individual specifications."

Contrary to the above, both auxiliary feedwater pumps were not fully operable from December 17, 1980 until January 12, 1981, with about 237 hours of operation in Modes 1 (power operation, ~32.2 hr.) 2 (startup, ~32.4 hr.), and 3 (hot standby, ~122.7 hr.) during that period; in that both auxiliary feed pumps were unable to deliver their design basis flow because the remotely operated auxiliary feedwater flow control valve openings were physically limited by local adjustment to 75% (about 480 gallons per minute flow).

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

II. Technical Specification 6.8.1 states in part:

"6.8.1 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.

Appendix "A" of Regulatory Guide 1.33, November, 1972 states in part:

"The following are typical safety-related activities which should be covered by written procedures. This appendix is not intended as an inclusive listing of all needed procedures since many other activities that are carried out during the operation phase of nuclear power plants should be covered by procedures that are not included in this list...

B. General Plant Operating Procedures...

10. Preparation for Refueling, Refueling Equipment Operation, and Core Alterations..."

Procedure FH-6, Core Reloading Procedure Unit 2, Revision 6, dated January 23, 1981 states in Step 6.2:

"Figure FH-6-1 shows the Control Element Assembly serial numbers for each core location in cycle 4."

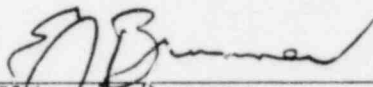
Contrary to the above, Procedure FH-6 was not properly implemented; in that the referenced figure was developed from a preliminary core loading map which listed incorrect core locations for eighty-eight fuel assemblies, nor did the core alteration procedures contain requirements to verify that the final Full Core Loading pattern supplied by the vendor was incorporated. The core loading

error was discovered during formal documentation and Quality Assurance checks by the vendor on February 10, 1981 and corrected on February 11, 1981 by reorienting the eighty-eight fuel assemblies.

This is a Severity Level V Violation (Supplement I), applicable to 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 violations, 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 **JUL 15 1981**



Eldon J. Brunner
Acting Director, Division of
Resident and Project Inspection