APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company
Calvert Cliffs Unit 1

Docket No. 50-317
License No. DPR-53

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

A. 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 I, Procedures for Performing Maintenance:

"...5. General Procedures for the control of maintenance, repair, replacement, and modification work should be prepared before reactor operation is begun. These procedures should include information on areas such as the following:

a. Method for obtaining permission and clearance for operations personnel to work and for logging of such work

b. Factors to be taken into account in preparing the detailed work procedures, including the necessity for minimizing radiation exposure to workmen."

Calvert Cliffs Instruction 200E, approved May 29, 1981, states in part: "Maintenance Requests (MRs) are used to initiate corrective maintenance performed by the plant maintenance units. Corrective maintenance covers repair, rework, calibration, or adjustment of structures, systems, or components to correct a deficiency or fault."

OFFICIAL RECORD COPY

Contrary to the above, adjustment of the full stroke timing of Main Steam Isolation Valve (MSIV) 11 was performed on June 15, 1981 by mistake with no MR initiated. The adjustment was performed concurrent with MSIV 12 adjustment on June 15, 1981, approved by MR 0-81-2621 to repair an out of specification stroke time of MSIV 12 (only).

This is a Severity Level V (Supplement I) violation.

B. 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:

"(H.2) Specific procedures for surveillance tests, inspections, and calibrations should be written (implementing procedures are required for each surveillance test, inspection, calibration listed in technical specifications):"

Technical Specification 4.3.2.1.1 requires that a Channel Functional Test be conducted monthly for the Refueling Tank Water Tank - Low Level Switches of the Containment Sump Recirculation System (RAS).

Procedure STP M-220-1, ESFAS Functional Test, Revision 2 approved September 22, 1980, states in Section V, Refueling Water Tank Level Switch Calibration Check Procedures:

"B.7 Return level switch to its proper lineup... 1-LS-4142C ( )"

Contrary to the above, procedure STP-M-220-1 was not properly implemented when performed on May 26, 1981, in that Level Switch 1-LS-4142C was not returned to its proper lineup. The lineup error was discovered by observation of closed instrument isolation valves on June 12, 1981.

This is a Severity Level V (Supplement I) violation.

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the 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.

Where good cause is shown, consideration will be given to extending your response time.

Dated AUG 7 1981

Original signed by
R. R. Keimig, Chief

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

OFFICIAL RECORD COPY