

BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.

VICE PRESIDENT

SUPPLY

March 17, 1982

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

Docket Nos. 50-317
50-318

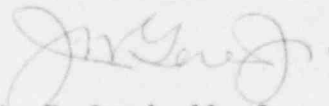
ATTENTION: R. W. Starostecki, Director
Division of Project and Resident
Programs

Gentlemen:

This refers to your Inspection Report 50-317/82-02; 50-318/82-02,
which transmitted two items of apparent noncompliance with NRC
requirements. Enclosure (1) to this letter is a written statement
in reply to those items.

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

Very truly yours,



for A. E. Lundvall, Jr.
Vice President - Supply

AEL/DWL/gla

Enclosure (1)

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC

March 17, 1982

STATE OF MARYLAND:

TO WIT:

CITY OF BALTIMORE:

John W. Gore, 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 made 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:

Lucretia H. Grise

Notary Public

My Commission Expires:

July 1, 1982

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/82-02; 50-318/82-02

ITEM A.1

As reported in Licensee Event Report 50-317/82-04/4T, the procedures controlling the Waste Neutralizing Tank (WNT) were revised to clarify the surveillance requirements to be performed prior to opening the WNT bypass. All Water Treatment Technicians have been made aware of this event and have been instructed on the procedure changes.

ITEM A.2

ASME Code Section XI, 1974 Edition with Addenda through Summer 1975 is the governing code for the repair of the Saltwater Piping System. However, Article IWA-4000, Repair Procedures, Subarticle IWA-4100, Scope, Subparagraph IWA-4100(C) states: "If rules for a particular repair are not specified in this division, repairs may be performed in accordance with the provisions of the code applicable to the construction of the component". Since the rules for the particular type of welding associated with this repair were not specified in this division of the Code, the special process controls of the Construction Code, ANSI B31.1, were specified on Weld Authorization Traveler (WAT) Serial 81-75.

An additional reference to ASME Section XI should have been included, because this code governs procedure review by the Authorized Nuclear Inspector and pressure testing following the weld repair. With regard to the latter, an exemption from pressure test requirements was requested for the Saltwater System by letter dated March 29, 1980, which stated that operational tests would be performed in lieu of pressure tests.

The Piping Class Summary Sheets (M-601) specified the appropriate process controls (Construction Code ANSI B31.1) for the repair weld. However, an additional reference to ASME Section XI was not indicated on WAT Serial 81-75. Training in proper completion of the Weld Authorization Traveler will be conducted for Welding Foremen and Senior Welders by April 30, 1982.