

SEP 7 1993

Docket Nos. 50-317
50-318

Mr. Robert E. Denton
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657 - 4702

Dear Mr. Denton:

SUBJECT: INSPECTION REPORT NOS. 50-317/93-18; 50-318/93-18

This refers to your August 18, 1993, correspondence, in response to our July 19, 1993, letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Lee H. Bettenhausen

Lee H. Bettenhausen, Chief
Operations Branch
Division of Reactor Safety

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Mr. Robert E. Denton

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cc:

G. Detter, Director, Nuclear Regulatory Matters (CCNPP)
R. McLean, Administrator, Nuclear Evaluations
J. Walter, Engineering Division, Public Service Commission of Maryland
K. Burger, Esquire, Maryland People's Counsel
R. Ochs, Maryland Safe Energy Coalition
K. Abraham, PAO (2) (w/copy of letter dtd August 18, 1993)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Maryland (2) (w/copy of letter dtd August 18, 1993)

bcc:

Region I Docket Room (with concurrences)
C. Cowgill, DRP
L. Nicholson, DRP
D. Weaver, DRP
P. Wilson - Calvert Cliffs
V. McCree, OEDO
R. Capra, NRR
D. McDonald, NRR
DRS Files (2)

(VIA E-MAIL AND NO ATTACHMENT)

L. Bettenhausen, DRS
N. Blumberg, DRS
A. Finkel, DRS

RI:DRS
Finkel/dmg
af
09/01/93

RI:DRS
Blumberg
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Bettenhausen
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1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

ROBERT E. DENTON
VICE PRESIDENT
NUCLEAR ENERGY
(410) 260-4455

August 18, 1993

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Reply to Notice of Violation 50-317(318)/93-18-01

REFERENCE: (a) Letter from L. H. Bettenhausen (NRC) to Mr. R. E. Denton
(BG&E), dated July 19, 1993, Notice of Violation NRC Inspection
Report Nos. 50-317/93-18 and 50-318/93-18

In response to Reference (a), Attachment (1) is provided.

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

Very truly yours,

RED/CDS/bjd

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC

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ATTACHMENT (1)

REPLY TO NOTICE OF VIOLATION 50-317(318)/93-18-01

I. DESCRIPTION OF VIOLATION.

The subject Notice of Violation (NOV) is concerned with our control of maintenance material/equipment "drop off" areas in accordance with 10 CFR Part 50, Appendix B, Criterion VIII and our corresponding site implementing procedures. The NOV and its accompanying cover letter indicated drop off points had evolved from temporary storage areas into defacto warehouses and therefore fell under, but did not meet, our established warehouse requirements. The cover letter elaborated that the violation was of concern because our Quality Assurance Program should have identified that the drop off areas were not conforming to the requirements of our Calvert Cliffs Instruction (CCI)-162, "Procurement and Control of Items and Services for Calvert Cliffs."

II. BACKGROUND.

Our warehouses are outside the protected area and controlled by CCI-162. The referenced drop off areas are located inside the protected area in close proximity to our Maintenance Shops and are controlled by CCI-207, "Control of Safety-Related and Augmented Quality Spare Parts." The drop off areas were established as temporary equipment staging areas to support near term scheduled maintenance and as storage areas for non-safety-related consumables. Calvert Cliffs Instruction-207 does not contain the same extensive requirements for long-term storing, protective packaging, segregation, and storage inspection as CCI-162. Calvert Cliffs Instruction-207 was developed to ensure adequate control of parts on a short-term basis and requires that if a part is not used it shall be returned to the warehouse as soon as possible. We concur that the evolution of drop off points long-term storage areas is inappropriate and can be viewed as contrary to CCI-207 or to CCI-162.

Our Quality Assurance organization identified many of these weaknesses in the implementation of CCI-207 during audits conducted in early 1993. These audits also found that CCI-207 was weak in control of safety-related (SR) and augmented quality (AQ) parts in accordance with Appendix B requirements. At the time of the inspection, responsible line organizations were in the process of planning corrective actions.

III. REASON FOR VIOLATION.

The causes of the drop off areas not complying with Appendix B requirements are attributed to the following factors:

1. A lack of knowledge of drop point inventory requirements by engineering and maintenance personnel using the drop off areas.
2. Lack of clear guidance in CCI-207 concerning the return of parts to the warehouse.
3. Confusion over responsibility for performing some drop off area inspections.

IV. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED.

We have evaluated our use of drop off points and determined that they fill a necessary role in staging parts to the field. Thus, we have undertaken measures to define the type of materials and duration of storage that is appropriate, and we have initiated measures to upgrade the conditions and inventory accountability of materials at the drop points that receive SR and AQ parts and materials.

ATTACHMENT (1)

REPLY TO NOTICE OF VIOLATION 50-317(318)/93-18-01

Personnel qualified to ANSI 45.2.6 have been assigned to these drop off areas to inspect returned SR and AQ parts and ensure packaging and general storage requirements are being met. Our Procurement Engineering staff has inspected SR and AQ part drop off areas and made recommendations for repackaging of parts and evaluated necessary cleaning of parts prior to repackaging. Initial actions are complete. These corrective measures will result in the proper receipt, storage, inspection, packaging, and segregation of SR and AQ items in the drop off areas that receive SR and AQ parts and materials.

V. CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS.

We have begun actions that will assimilate SR and AQ material/equipment drop off areas into the warehouse area of operations. Drop off areas for SR and AQ material/equipment will be controlled under applicable CCI-162 requirements and run by personnel with proper training and qualifications on those requirements and responsibility for ensuring they are met. We expect this transition to be completed by the end of the first quarter 1994.