



CHARLES CENTER • P.O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

August 12, 1982

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

Docket Nos.	50-317
	50-318
License Nos.	DPR-53
	DPR-69

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

Gentlemen:

This refers to your Inspection Report 50-317/82-16; 50-318/82-14, which transmitted one item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to that item noted in your letter of July 16, 1982.

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

Very truly yours,

Vice President - Supply

AEL/DWL/gla

Enclosure

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

Mr. R. W. Starostecki
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STATE OF MARYLAND :
 : TO WIT:
CITY OF BALTIMORE :

Arthur E. Lundvall, 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:

Ruth H. Grese
Notary Public

My Commission Expires:

July 1, 1986

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/82-16; 50-318/82-14

Item A

Technical Specification 3/4.3.2, Engineered Safety Features Actuation System Instrumentation requires that the Auxiliary Feedwater Actuation System (AFAS) be operable in **MODES** 1, 2, and 3. Contrary to this requirement, the AFAS was found to be inoperable following entry into **MODE 3** from **MODE 4** on June 28, 1982, when the handswitches for the main steam supply isolation valves (MOV-4070 & 4071) were in pull-to-lock. Upon discovery, the handswitches were immediately returned to their normal positions. Initiation of auxiliary feedwater flow in the event of an AFAS would not have been delayed due to the procedural steps in the Alarm Manual which would have directed operators to manually initiate auxiliary feedwater flow upon receipt of an AFAS Time Delay initiated alarm.

Neither the plant start-up procedure checklist or the Surveillance Test Procedure 0-62, "Monthly Valve Position Verification," provided a check of the two handswitches prior to entry into **MODE 3**. Both documents have been revised to include a check of the valve position prior to entry into **MODE 3**. Additionally, a verification of the sufficiency of administrative controls for **MODE 1 & 2** Technical Specification Limits was conducted prior to completion of the start-up.