



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

ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

September 17, 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: T. T. Martin, Director  
Division of Engineering  
and Technical Programs

Gentlemen:

This refers to your Inspection Report 50-317/82-20; 50-318/82-17, 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 August 19, 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. T. T. Martin  
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STATE OF MARYLAND :  
                          : TO WIT:  
CITY OF BALTIMORE :

Henry H. Miller 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 W. Grese  
Notary Public

My Commission Expires:

July 1, 1986

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/82-20; 50-318/82-17

Appropriate corrective and preventative actions are listed below and address each of the specific items identified in the notice of violation, as well as the associated generic problems. Through implementation of these actions procedures will be adequately established and records of changes to operating procedures will be retained to prevent future violations of this nature.

- There was no alarm response procedure for Annunciator Panel IC09, Alarm H23, "LPSI Pump RAS Override."

Calvert Cliffs Instruction-126, "Administration and Control of Facility Change Requests," requires Operations to update procedures and instructions to reflect plant modifications. Contrary to this requirement the alarm response procedure was not updated to reflect the installation of a LPSI pump RAD override accomplished during the Unit 1 1982 Refueling Outage. The Alarm Manual was revised on August 4, 1982, to correct this omission. Existing administrative controls within the Operations engineering staff have been strengthened to ensure that appropriate operating procedures are revised prior to plant start-up, reflecting the plant modifications completed during refueling outages. The General Supervisor-Operations has reviewed this event with the personnel from the Operations engineering staff who are responsible for these procedure changes.

- Operating Instruction-3, "Safety Injection, Shutdown Cooling, and Containment Spray Unit 1," paragraph X.A.3, states that the Refueling Water Tank Low Level Alarm is 24" while the actual alarm setpoint is 462".

This procedure has been revised to correct this inadequacy. The remainder of the Operating Instructions will be reviewed to determine if similar setpoint inaccuracies exist. This review, and any revisions, resulting from this review will be complete by October 15, 1982.

- Operating Instruction-3, Figure 2, "Safety Injection Tank, Level vs. Volume Curve," shows an incorrect level vs. volume relationship as the 29" from the level tap to the bottom of the tank is not accounted for.

This figure will be corrected to show the correct volume vs. actual level and indicated level. This correction will be incorporated into Operating Instruction-3 by October 15, 1982. The remaining curves in the Operating Instructions have been reviewed and appropriate changes to these curves, providing greater accuracy and clarity, will be completed by December 1, 1982.

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

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- Abnormal Operating Procedure-2, "Loss of Salt Water Cooling (Units 1 & 2)" did not address the possibility of system blockage which could cause failure of saltwater flow nor did the procedure address the use of the emergency saltwater discharge piping.

A revision to AOP-2 to reference the applicable section of Operating Instruction-29, "Saltwater System" regarding use of the emergency saltwater discharge piping will be incorporated into AOP-2 by November 1, 1982.

- Precautions listed in Operating Instruction-21, "Emergency Diesel Generators," Operating Instruction-24, "Spent Fuel Pool Cooling System," and Operating Instruction-42, "CEDM Operations," are inadequate in that they refer to entire Technical Specification sections rather than specific applicable Technical Specifications paragraphs.

These procedures will be revised by October 1, 1982. The remaining Operating Instructions will be reviewed to determine if similar inadequacies exist. This review, and any revisions required by this review will be completed by November 1, 1982.

- Operating Instruction 11A, "Condensate System" and Operating Instruction-32, "Auxiliary Feedwater System," Figure 1, "Condensate Storage Tank Level vs. Volume Curve" is illegible.

A review of Operating Instructions did not reveal any other curves in this category. This curve will be redrawn and incorporated into the Operating Instructions by October 15, 1982.

- Records of revisions to Alarm Response Procedures were not being maintained.

Calvert Cliffs Instruction-302, "Calvert Cliffs Alarm Manual," will be revised to require the maintenance of a history file. This revision and the establishment of the history file shall be completed by November 1, 1982.