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March 9, 1994

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 Inspection Report Nos. 50-317(318)/93-33
Failure to Adequately Implement Foreign Material Controls

REFERENCE: (a) Letter from Mr. C. J. Cowgill (NRC) to Mr. R. E. Denton (BGE),
dated January 25, 1994, NRC Region I Resident Inspection Report
Nos. 50-317/93-33 and 50-318/93-33

In response to Reference (a), please find Attachment (1) detailing our response to the cited violation concerning foreign material controls.

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

Very truly yours,

RED/WDM/wdm/bjd

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
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ATTACHMENT (1)

REPLY TO NOTICE OF VIOLATION INSPECTION REPORT NOS. 50-317(318)/93-33

FAILURE TO ADEQUATELY IMPLEMENT FOREIGN MATERIAL CONTROLS

I. DESCRIPTION OF VIOLATION

Reference (a) states that on November 19, 1993, prohibited foreign material was present in the spent fuel pool foreign material control area. This included gray duct tape, hemp rope, nylon tie wraps, and nylon rope. In addition, several foreign material items were present in the spent fuel pool area that were not entered in the personnel and control log. This included life jackets, metal valve handwheel wrenches, scaffold boards, an extension cord, and a rubber hose. Reference (a) characterized this as a violation of 10 CFR Part 50, Appendix B, Criterion V.

II. REASON FOR VIOLATION

The violation occurred as stated. Most of the specific deficiencies were caused by poor change implementation. The Spent Fuel Pool area was posted with a strict list of prohibited items, and adequate measures were not taken to ensure that the area met those standards prior to implementing the requirement. More generally, past performance of our foreign materials control program has not met our expected standards due to weaknesses in training, procedural complexity, and less than adequate supervisory attention to the issue. The actions outlined below have been taken to address both the specific circumstances of this violation and these underlying factors.

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Following discovery of the violation, we reviewed our implementation of cleanliness requirements in the Spent Fuel Pool area and appropriate action was taken to correct the cited deficiencies. Items were removed from the area, properly logged in, or removed from the posted exclusion list as deemed appropriate.

Based on a thorough self-assessment of the issue during the Unit 2 refueling outage in 1993, we conducted a major revision of Calvert Cliffs Instruction (CCI)-206, "Foreign Material Exclusion." This procedure was streamlined and re-sequenced to make it easier to use in the field. Responsibilities of individuals are now much more clearly defined and specific requirements clarified. Following pre-implementation training, which included mock-up training for first line maintenance supervisors and craft personnel, this revision became effective on December 6, 1993.

A memorandum of expectations was issued by Primary Systems Engineering to site supervisors for distribution to all appropriate personnel. The memorandum reiterated specific requirements set forth in the revision of CCI-206 discussed above.

Supervision has vigorously emphasized cleanliness over the past several months. Although performance has not yet reached the desired level, a strong improving trend is evident. Although occasional lapses like the case in question are not acceptable, we believe our corrective measures were the right steps, and that continued improvement will be experienced.

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

Site supervision will continue to emphasize the importance of Foreign Material Exclusion (FME) standards. This will be accomplished through enhanced training, aggressive self-assessment, and increased emphasis on emergent FME issues at management and supervisory forums. We are conducting more periodic surveillances of work in progress, and we are stressing prompt correction of identified deficiencies. Management will ensure supervisors and workers are held strictly accountable for performance in this area.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on November 20, 1993 upon correction of the cited deficiencies in the Spent Fuel Pool area.