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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

November 16, 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 50-317/82-26; 50-318/82-22, which transmitted two items of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to those items noted in your letter of October 18, 1982.

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

Very truly yours,

Arthur E. Lundvall, Jr.

Vice President - Supply

AEL/DWL/gla

Enclosure

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

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT NO. 50-317/82-26; 50-318/82-22

Item A.1

As noted in Appendix A, the fuel pin serial numbers were not verified during pin transfer operations conducted on September 15, 1982. No immediate corrective action was required since a TV camera was used to verify that all 16 fuel pins that had been in the storage basket were now in the fuel pin shipping basket. The serial numbers of all the fuel pins had been documented earlier with the assistance of a periscope when the pins were initially placed in the fuel pin storage basket.

The violation implies that the fuel pin transfer directed by fuel handling procedure, FH-35, was a refueling operation. Actually both units were at power and refueling was not in progress. The evolution being conducted was the preparation of some experimental fuel rods for shipment to a hot cell. The Technical Specifications do not require a procedure for this type of evolution, however, a procedure was required by the Baltimore Gas & Electric's Quality Assurance program. This program recognizes the hazards of handling these components and requires procedures that control the handling of core components in all situations. The individual performing the procedure had moved the pins into the basket and identified the serials numbers at an earlier date. At this point, he felt it was not necessary to identify the pins again. This individual was aware of how to make procedure changes and made a judgement that no procedure change was necessary.

An investigation of this particular violation and the surrounding circumstances revealed that the principal cause was a judgement error. Other weaknesses were also noted. The actions taken to correct these weaknesses are as follows:

1. Future procedures involving fuel handling will identify the position of the person who is in charge of the evolution.

2. All fuel handling procedures that involve outside vendors will require a sign-off to document that the vendor has been trained on :

    a. the potentially severe radiological hazards of irradiated core components and,

    b. the administrative requirements of BG&E Fuel Handling procedures.

These changes have been incorporated in the fuel handling procedures and we have achieved full compliance.

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT NO. 50-317/82-26; 50-318/82-22

Item A.2

This violation was caused by a failure to recognize that a change to the Final Safety Analysis Report (FSAR) prior to making procedural changes providing for installation of the blind flange was necessary. Contributing to this failure was the recollection by key members of the plant staff that no credit was given for this system by the NRC review of the safety analysis report (each Hydrogen Recombiner is totally redundant to this system). Additionally, it is extremely doubtful that the Hydrogen Purge System could ever be used in a post accident situation since its use could result in large amounts of radioactivity being released to the environment.

The FSAR will be revised to exclude reference to the Hydrogen Purge System. This change will be part of the next annual revision to the FSAR. The instruction for the Calvert Cliffs Operating Manual (CCOM) will be changed providing a checklist for making revisions to the CCOM. This checklist will include the FSAR. It is expected that these corrective and preventive actions will be completed by February 28, 1983.