

APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company
P. O. Box 1475
Baltimore, Maryland 21203

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-60

As a result of the inspection conducted on March 15-19, 1982, and in accordance with the NRC Enforcement Policy, 10 CFR 2, Appendix C, the following three violations were identified:

- A.1 Technical Specification 6.8, "Procedures", states that written procedures shall be established, implemented and maintained as recommended by Regulatory Guide 1.33, 1972, Appendix "A". Appendix "A" specifies that detailed work procedures be prepared specifically for the repair of In-core Flux Monitoring Systems and include factors necessary for minimizing radiation exposure to workmen relative to maintenance, repair, replacement and modification.

Contrary to the above, on February 4, 1981, detailed work procedure RV-19 "Incore Thimble Removal," used by two maintenance personnel working with an ICI wire spool, did not provide instructions or directions necessary to assure that adequate radiation protection was implemented for personnel working with ICI components in the spent fuel pool. Factors necessary for minimizing radiation exposure to personnel under the conditions present were not included.

This is a Severity Level IV Violation (Supplement IV)

- A.2 Technical Specification 6.11, "Radiation Protection Program," requires that procedures for the radiation protection program be prepared in accord with the requirements of 10 CFR 20, and approved, maintained and followed for all operations involving personnel radiation exposure. Procedure RCP-3-602, "Radiation Work Permit," Section 4.41, states that an RWP may not be used, without prior approval, for work in an area where conditions are likely to change abruptly.

Contrary to the above, on September 30, 1981, two Fuel Management Engineers performed work in the spent fuel pool beyond the scope of RWP 81-6 without prior approval which caused abrupt changes in the radiological conditions in the pool. As a consequence the workers received unplanned exposures of 180 and 140 mrem, respectively; and were subject to substantial potential for exposure in excess of the limits of 10 CFR 20.101.

This is a Severity Level IV Violation (Supplement IV)

OFFICIAL RECORD COPY

- A.3 10 CFR 20.201, "Surveys," requires each licensee to make surveys as necessary to comply with the regulations contained in 10 CFR 20 as are reasonable, under the circumstances, to evaluate the extent of radiation hazard that may be present.

Contrary to the above, on February 4, 1981, surveys were not made to support work being performed by two workers raising an ICI wire spool from the spent fuel pool. As a result the workers received unplanned radiation exposures of 1500 and 660 mrem, respectively; and were subject to the substantial potential for exposure in excess of the limits of 10 CFR 20.101.

This is a Severity Level IV Violation (Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.

date