

Appendix A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company

Docket/License 50/317;DPR53

Calvert Cliffs Unit 1

As a result of the inspection conducted on September 14 - October 12, 1982 and in accordance with the NRC Enforcement Policy, (10CFR 2 Appendix C) published in the Federal Register on March 9, 1982 (47FR9987), the following violations were identified:

A.1 Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering refueling operations. Fuel Handling Procedure FH-35, Revision 2 approved September 8, 1982, was established to govern refueling operation activities involving inspection of irradiated fuel, fuel assembly reconstitution, and fuel pin transfers in the spent fuel pool. Procedure step 5.6 directs the transfer of fuel rods using a fuel rod handling tool. A note for this step states that during such transfers it will be necessary to have an underwater TV system in operation so that the fuel rod serial numbers and shipping basket locations of the individual rods can be verified. Procedure step 5.7 requires that Table 1 be maintained as each rod is transferred. This table contains initialled verification of the fuel pin serial numbers and locations.

Contrary to the above, fuel pin serial numbers were not verified during pin transfer operations conducted on September 15, 1982.

This is a Severity Level V violation (Supplement I)

A.2 10CFR 50.59(a)(1) permits a change to a facility or procedure as described in the Safety Analysis Report, without prior Commission approval, only when a change in the Technical Specifications or an unreviewed safety question is not involved. 10CFR50.59(a)(2) states that an unreviewed safety question is involved if the probability of occurrence of a malfunction of equipment important to safety previously evaluated in the Safety Analysis Report may be increased. Section 6.8.3.1 of the Final Safety Analysis Report describes the Hydrogen Purge System as a system which "shall be used as a means of hydrogen control should both recombiners fail to function properly."

Contrary to the above, Revision 3 to Operating Instruction 41 B modified the Hydrogen Purge System lineup through the addition of a blind flange to the replacement blower discharge, in a manner that would render the system inoperable. On or before September 24, 1982 the above blind flange was installed on the Unit 1 Hydrogen Purge System.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10CFR2.201, 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 the response time.