



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

January 18, 1991

U. S. Nuclear Regulatory Commission
Washington, D.C. 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
NRC Resident Inspection Report Nos. 50-317/90-29 and 50-318/90-29
(October 21, 1990, to November 24, 1990)

REFERENCES: (a) U. S. Nuclear Regulatory Commission
Letter from James C. Linville to George C. Creel
Dated: December 18, 1990,

Gentlemen:

Reference (a) forwarded Nuclear Regulatory Commission (NRC) Region I Notice of Violation based on NRC Resident Inspection Report Nos. 50-317/90-29 and 50-318/90-29, dated December 18, 1990. The violation involved an individual being permitted access to the Protected Area, by a Nuclear Security Force Member, through the Security Processing Building without being issued a Protected Area Badge.

The Baltimore Gas and Electric Company's (BG&E's) response to the Notice of Violation is provided in an enclosure to this letter.

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

Very Truly Yours,

G. Dowell Schwartz, Jr.
Vice President
General Services Division

Enclosures: (1) Response to Notice of Violation
(NRC Resident Inspection Report Nos. 50-317/90-29 and 50-318/90-29)

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ENCLOSURE (1)

Response to Notice of Violation NRC Resident Inspection Report Nos. 50-317/90-29 and 50-318/90-29

I. Description and Cause of the Event

At 4:10 p.m., October 22, 1990, a U.S. Nuclear Regulatory Commission Inspector, entered the Protected Area at Calvert Cliffs Nuclear Power Plant without a Protected Area badge.

Shortly before the event, the Inspector completed processing in the Security Screening Unit for unescorted access to the Protected Area.

The Inspector entered the Security Processing Building and, being unfamiliar with entrance procedures since he was a new inspector and new to the site, did not stop at the badging counter, but proceeded directly to the search equipment and was processed. The turnstiles, which are normally activated by a card key, were malfunctioning and in a "free-wheeling" mode at the time. Observing other personnel hold identification to the Secondary Alarm Station window, the Inspector displayed either his NRC credentials or Site Identification Badge to the Nuclear Security Systems Operator, who was controlling final access. The operator allowed the Inspector to enter the Protected Area.

Upon arrival at the NRC offices, another NRC Inspector noticed that the Inspector was not displaying a Protected Area badge. When it was verified the Inspector had not obtained his Protected Area badge, Security was notified. At 4:15 p.m. a Senior Nuclear Security Officer escorted the Inspector out of the Protected Area. The Inspector then obtained his Protected Area badge and reentered the Protected Area.

The causes of the event were: personnel error on the part of the Nuclear Security Systems Operator, who mistook the displayed identification for a Protected Area badge; and, inadequate site specific orientation of the NRC Inspector. A contributing factor was the malfunctioning turnstiles which, because normally card key activation is required to gain access, would have prevented the event.

II. Corrective Steps Taken and Results Achieved

The turnstiles were repaired on October 23, 1990, and placed back in service.

The Nuclear Security Systems Operator received immediate remedial training from the Security Training and Education Unit. Appropriate administrative action has been taken against the Nuclear Security Systems Operator.

Security Management met with all Security shifts to discuss the event, including preventive and compensatory measures to be taken to avoid recurrence.

III. Corrective Steps Which Will Be Taken to Avoid Further Violations

The Security Training and Education Unit is developing a special lesson plan concerning this and other recent events. The training will be given in Nuclear Security Training's initial and requalification training programs for all Nuclear Security Personnel. Initial and requalification training programs will be completed by July 1, 1991.

Compensatory measures for malfunctioning turnstiles now include posting a Nuclear Security Force Member at the affected turnstile to verify that personnel possess a Protected Area Badge prior to access.

Site Specific Training, a special program for Nuclear Regulatory Commission personnel, will be revised to include more detail in the Protected Area entry process. In addition, more emphasis will be placed on the Protected Area entry process security requirements during initial and requalification General Orientation Training (GOT) for plant personnel with, or pending, unescorted access.

ENCLOSURE (1)

(Continued)

**Response to Notice of Violation
NRC Resident Inspection Report Nos. 50-317/90-29 and 50-318/90-29**

IV. Date When Full Compliance Will Be Achieved

The Baltimore Gas and Electric Company has been in full compliance with its Security plans and procedures since 4:15 p.m. on October 22, 1990, the date of the event.