

JAN 02 1990

Docket Nos. 50-317
50-318

Baltimore Gas and Electric Company
ATTN: Mr. George C. Creel
Vice President
Nuclear Energy
Calvert Cliffs Nuclear Power Plant
MD Rts 2 & 4, P.O. Box 1535
Lusby, Maryland 20657

Gentlemen:

Subject: Combined Inspection Report No. 50-317/90-27 and 50-318/90-27

This refers to your letter dated December 7, 1990, in response to our letter dated November 1, 1990.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Original Signed by:

James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards

cc w/encl:

R. McLean, Administrator, Nuclear Evaluations
J. Walter, Engineering Division, Public Service Commission of Maryland
G. Adams, Licensing (CCNPP)
K. Burger, Esquire, Maryland People's Counsel
P. Birnie, Maryland Safe Energy Coalition
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
K. Abraham, PAO (29) SALP Report and (2) All Inspection Reports
NRC Resident Inspector
State of Maryland (2)

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 Management Assistant, DRMA (w/o encl)
 R. Bellamy, DRSS
 J. Linville, DRP
 C. Cowgill, DRP
 C. Lyon, DRP
 D. Vito, DRP
 B. Summers, DRP
 M. Conner, DRP (SALP Reports Only)
 M. Callahan, OCA
 D. McDonald, NRR
 R. Capra, NRR
 J. Caldwell, EDO

Jang
 RI:DRSS
 Jang
 12/20/90

RI:DRSS
 Bones
 12/20/90

Joyner
 RI:DRSS
 Joyner
 12/26/90





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

GEORGE C. CREEL
VICE PRESIDENT
NUCLEAR ENERGY
(301) 260-4455

December 7, 1990

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
NRC Inspection Report Nos. 50-317/90-27 and 50-318/90-27

Gentlemen:

The subject Inspection Report cover letter expressed concern that we "appeared to take no actions as required by the Technical Specifications regarding three inoperable effluent monitors." Our actual deficiency was limited solely to reporting of actions taken. All other actions were properly taken.

Our response to the Notice of Violation regarding the omission of information from the Semi-annual Radioactive Effluent Report is provided in Attachment (1). As discussed with members of your staff, the response is provided 30 days after receipt of the Inspection Report.

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

Very truly yours,

GCC/JV/bjd

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
L. E. Nicholson, NRC
R. I. McLean, DNR

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ATTACHMENT (1)

RESPONSE TO NOTICE OF VIOLATION INSPECTION REPORT NOS. 50-317/90-27; 50-318/90-27

STATEMENT OF VIOLATION

"Sections 3.3.3.9 (Radioactive Gaseous Effluent Monitoring Instrumentation) and 3.3.3.10 (Radioactive Liquid Effluent Monitoring Instrumentation) of the Technical Specifications require, in part, in the event the monitoring instrument becomes inoperable, that the licensee '... exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.'

Contrary to the above requirements, the licensee did not report or explain in the Semiannual Effluent Release Reports why inoperable effluent monitors (1) Unit 2 Steam Generator Blowdown Effluent Monitor (inoperable since August 1989), (2) Liquid Radwaste Effluent Monitor (inoperable since March 1990), and (3) Waste Gas Holdup System Monitor (inoperable since March 1990) were not repaired in a timely manner."

BACKGROUND

On August 26 and 27, 1989, the Unit 1 and Unit 2, respectively, Steam Generator Blowdown (SGBD) effluent Radiation Monitoring Systems (RMSs) were declared inoperable. The Unit 1 SGBD RMSs were returned to service on February 26, 1990.

On March 12, 1990, the combined Units 1 and 2 Liquid Radwaste and Waste Gas Holdup System RMSs were declared inoperable. (LER 50-317/90-10).

In each case, the appropriate ACTION Statements of Technical Specifications 3.3.3.9 and 3.3.3.10 were entered and the compensatory actions taken. However, required entries were not made in the subsequent Semiannual Radioactive Effluent Release (SARER) Report.

The causes of the Violation were:

- The expiration of the Technical Specification 30 day ACTION requirement for making appropriate entries in the SARER Report was not tracked in the Control Room Operators (CRO) logs. Therefore, the administrative procedure for notifying the responsible organization was not initiated.
- Neither the Compliance Unit or the Chemistry Section followed up on the information available to them to verify that the SARER Report requirements were met.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN:

A review of both Unit's CRO logs for the past six months determined the problem was isolated to SARER Report entries related to the SGBD, Liquid Radwaste, and Waste Gas Holdup System RMSs. No other Special Reports required by Technical Specification ACTION Statements were missed.

A supplement to the SARER Report was issued on October 26, 1990. This supplement explained why the inoperability was not corrected in a timely manner, as required by Technical Specifications 3.3.3.9 and 3.3.3.10.

ATTACHMENT (1)

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-317/90-27; 50-318/90-27

Refresher training was conducted for all appropriate Compliance Unit personnel on Special Reports and the Administrative Procedures which govern Special Reports.

Operators have received clarification of requirements for CRO log tracking of Technical Specification Special Report ACTION Statements.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

In order to prevent recurrence, we will:

- Revise the Plant Logs instruction to clearly state the specific requirement for tracking Technical Specification Special Report ACTION statements in CRO logs ; and
- Incorporate measures for Chemistry to review the status of equipment which may require inclusion in the SARER Report as part of their report preparation.

Finally, the Compliance Unit is reviewing our administrative and supporting implementing procedures to ensure that appropriate initiating mechanisms are present for all Special Reports required by Technical Specifications.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance was achieved October 26, 1990, when the SARER Report supplement was submitted with the information required by Technical Specifications 3.3.3.9 and 3.3.3.10.