

October 25, 1995

Mr. Robert E. Denton
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657 - 4702

Dear Mr. Denton:

Subject: NRC Inspection Report Nos. 50-317/95-02; 50-318/95-02 and Notice
of Violation

This letter refers to your June 20, 1995 correspondence, in response to our
May 24, 1995, 1995 letter.

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.

Sincerely,

Original Signed by:

Lawrence T. Doerflein, Chief
Projects Branch No. 1
Division of Reactor Projects

Docket Nos. 50-317
50-318

cc:

T. Camilleri, Director, Nuclear Regulatory Matters (CCNPP)
R. McLean, Administrator, Nuclear Evaluations
J. Walter, Engineering Division, Public Service Commission of Maryland

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Robert E. Denton

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cc w/copy of licensee letter:

K. Burger, Esquire, Maryland People's Counsel

R. Ochs, Maryland Safe Energy Coalition

D. Screnci, PAO

PUBLIC

Nuclear Safety Information Center (NSIC)

NRC Resident Inspector

State of Maryland (2)

Robert E. Denton

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F. Lyon - Calvert Cliffs

T. Marsh, NRR

D. McDonald, NRR

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ROBERT E. DENTON
Vice President
Nuclear Energy

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 586-2200 Ext. 4455 Local
410 260-4455 Baltimore

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June 20, 1995

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
Unit 1 Temporary Lead Shielding Notice of Violation

REFERENCE: (a) Letter from Mr. C. J. Cowgill (NRC) to Mr. R. E. Denton (BGE),
dated May 24, 1995, Notice of Violation, Combined Inspection
Report Nos. 50-317/95-02 and 50-318/95-02

In response to Reference (a), Attachment (1) is provided.

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

Very truly yours,

RED/DWM/bjd

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
L. B. Marsh, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC

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ATTACHMENT (3)

NOTICE OF VIOLATION 50-317/95-02-01 AND 50-318/95-02-01

Notice of Violation 50-317/95-02-01 and 50-318/95-02-01 describes a non-conformance involving temporary lead shielding installed without an engineering evaluation as required by procedure.

I. REASON FOR THE VIOLATION

On the morning of Friday, February 17, 1995, a Radiation Safety Technician was investigating the source of a high count rate on a Unit 2 Component Cooling Water radiation monitor at the request of Plant Chemistry. In order to determine if the source of the elevated count rate was external to the monitor, the technician placed 75 pounds of lead shielding on a stepladder rated for over 200 pounds over the monitor. If this installation successfully lowered the detector count rate, the technician's intent was to pursue a Temporary Alteration as required by Radiation Safety Procedure RSP-1-203, Temporary Shielding. After securing the lead blankets to the stepladder, the technician contacted Plant Chemistry to determine whether the count rate had changed. The Chemistry Technician did not have the information at that time. The Radiation Safety Technician requested that he be given an update at the first availability and left the area. He later forgot about the shielding and went home for the weekend.

On Monday, February 20, 1995, the Radiation Safety Technician remembered the installation over the radiation monitor and contacted Plant Chemistry. He was informed that the shielding had had no effect. Shortly thereafter, he was informed that the Nuclear Regulatory Commission Resident Inspector had contacted the Shift Supervisor about the shielding. The technician then removed the installation. The cause of this violation was personnel error on the part of the technician in failing to follow an appropriate established process while installing the temporary shielding. This error stemmed from a desire to accomplish the task and an inappropriate belief that the brevity of the intended activity exempted it from the established Temporary Shielding procedural requirements.

An engineering evaluation later determined that there would have been no significant consequences had the ladder fallen on the radiation monitor.

This event shared some attributes with other unapproved or inappropriate configuration changes previously noted on site. To evaluate our overall effectiveness in controlling configuration changes under various processes, an interdisciplinary task force led by our Independent Safety Evaluation Group investigated 17 instances of problems during the past year. Most of these were minor in nature and had no impact on the operation of their associated systems. None significantly affected nuclear safety. The evaluation considered both events where the actual configurations created were inappropriate and cases where justifiable changes were implemented but without appropriate process controls. No single root cause tied all of the events. The investigation found instances where workers failed to implement process requirements in order to expedite work, cases where workers were unclear about what process to use, some instances of poor workmanship in executing the correct process, and some cases where "work-arounds" for equipment deficiencies were allowed for too long. Corrective actions to remedy each of these conditions were developed and agreed to by the appropriate line organizations.

ATTACHMENT (1)**NOTICE OF VIOLATION 50-317/95-02-01 AND 50-318/95-02-01****II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED**

Appropriate personnel action was taken for the individual involved in this event. Refresher training was conducted for all Radiation Safety Technicians on Temporary Shielding requirements and Temporary Alterations. The details of this event were covered. To ensure that personnel follow the appropriate procedure, the usage classification of the Radiation Protection shielding procedure has been changed from "Memory" to "Referral." This will require that personnel read the procedure prior to erecting shielding. They were previously allowed to rely on memory.

III. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

In response to the evaluation of generic implications discussed above, plant management is initiating the following actions: 1) assigning the General Supervisor, Plant Engineering overall responsibility for overseeing processes by which temporary changes to the plant configuration are controlled; 2) reiterating to plant personnel the expectation that work will be controlled by established processes and the need for tight configuration control; 3) revising the Temporary Alteration procedures and other processes to more clearly define their interfaces; 4) establishing periodic work observations and coaching sessions to ensure expectations are met; and 5) reviewing System Summary and Improvement Plans to ensure that work-arounds and operator compensatory actions are identified and have a plan to be removed. Additionally an effectiveness review of these actions will be conducted. These actions will be adjusted and revised as necessary based on this evaluation.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on February 20, 1995, when the temporary shielding was removed.