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GEORGE C. CREEL
VICE PRESIDENT
NUCLEAR ENERGY
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April 10, 1992

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
Response to Improper Operation of Emergency Air Lock Notice of Violation

REFERENCE: (a) Letter from Mr. C. J. Cowgill (NRC) to Mr. G. C. Creel (BG&E),
Combined Inspection Nos. 50-317/92-02; 50-318/92-02, dated
March 12, 1992

Gentlemen:

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

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

Very truly yours,

GCC/DWM/dwm/dlm/bjd

Attachment

cc: D. A. Brune, Esquire
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ATTACHMENT (1)

IMPROPER OPERATION OF EMERGENCY AIR LOCK NOTICE OF VIOLATION

I. DESCRIPTION AND CAUSE OF EVENT

We have reviewed this event and concur that it constituted a valid quality problem. As described in LER 91-007, the failure of the personnel involved in this event to verify that pressure had equalized before opening the door was a contributing cause of this event. Our conclusion is that, although operation of the door is within the bounds of our expectations for skill of the craft, the personnel involved in this event had not been made sufficiently aware of the need to allow pressure to equalize across the Emergency Air Lock (EAL) door prior to opening it. Instructions posted at the air lock door and adequate awareness training would have provided an extra measure of defense to prevent this event.

Our design barrier to breaches of containment integrity via the EAL is its interlock mechanism, which provides door position indication and prevents operation of one door while the other is unlatched. The primary cause of this event was failure of the interlock. This problem is being investigated and the mechanism will be repaired.

An additional item discussed in Reference (a) concerned our not having initiated an investigation into the human factors implications of this event in a timely manner. An Issue Report (IR) was initiated the day of this event and later reviewed by the Issues Assessment Unit. On January 9, 1992, as part of its normal reportability review, Compliance determined the event to be reportable as an LER in accordance with the requirements of 10 CFR 50.73. Human factors considerations are routinely addressed during LER investigations. The failure to direct a human factors investigation had this event not been reportable was documented as a problem in an IR on January 10, 1992.

II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

We have posted signs at the interior and exterior doors and inside the air lock for the Unit 1 and 2 EAL and Personnel Air Lock. These signs caution against opening air lock doors rapidly or before pressure across them is equalized and require contacting the Control Room if pressure does not equalize within 60 seconds (positive indication that the interlock is defeated and the other door is open). The posting of these signs is controlled by Calvert Cliffs Instruction CCI-308. Additionally, the signs' continued presence at each air lock will be verified on a refueling interval basis.

To ensure personnel are aware of the need to exercise caution when operating air locks, we have added a discussion of the details of this and similar industry events to annual General Orientation Training. The training also includes cautions against opening the doors too quickly or without pressure equalizing across them.

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

The above actions are sufficient to prevent future incidents of this type.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when the permanent signs were posted at the air locks.