

APPENDIX A  
NOTICE OF VIOLATION

Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant

Docket Nos. 50-317; 50-318  
License Nos. DPR-53; DPR-69

During an NRC inspection conducted on April 13 - 17, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1992), the violation is listed below:

- A. Title 10 Code of Federal Regulations (CFR) Part 71.5 requires, in part, that licensee's who transport radioactive materials from their site must comply with the applicable regulations for transportation contained in 49 CFR Parts 170 through 189. Part 172.200 requires, in part, that each person who offers a radioactive material for transport shall describe the radioactive material on shipping papers. Part 172.203(d) requires, in part, that the description for a shipment of radioactive material must include the activity contained in each package.
- B. Title 10 CFR Part 20.311 requires, in part, that each shipment of radioactive waste to a licensed land disposal facility must be accompanied by a shipment manifest that contains radionuclide identity and total radioactivity.

Contrary to A and B above, between June, 1991 and February, 1992, the licensee made five shipments of radioactive waste in the form of spent resins to the Barnwell Waste Management Facility in Barnwell, South Carolina (a licensed land disposal facility), with the total activity for each package and most of the individual radionuclide activities in error, due to erroneous data supplied to the licensee's Materials Processing Section by the licensee's Chemistry Department. The errors were in the conservative direction, with each manifest overestimating the total activity by approximately 20%.

This is a Severity Level IV violation.

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to

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extending the response time.

Dated at King of Prussia, Pennsylvania  
this 21st day of April, 1992