BALTIMORE
GAS AND
ELECTRIC

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

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

June 29, 1984

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

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

ATTENTION: Mr. R. W. Starostecki, Director
Division of Project & Resident
Programs

Gentlemen:

This refers to Inspection Report 50-317/84-01, 50-318/84-01; which transmitted one item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to that item noted in your letter of June 1, 1984.

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

Very truly yours,

Arthur E. Lundvall, Jr.

AEL/LOW/tlm

Enclosure

cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC

IE: 01
1/1

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION REPORT 50-317/84-01; 50-318/84-01

We have reviewed the circumstances that led to the apparent violation of Technical Specification 3.6.4.1 requiring that the Post Accident Sampling Liquid Return Valve to Reactor Coolant Drain Tank (SV-6529) and Hydrogen Sample Return Valves (SV-6507G & SV-6540G) be administratively maintained in the required position during **MODES** 1-4 operation. The root causes of the valve mispositioning events are: (a) inadequate procedures for instructing personnel regarding Technical Specification containment isolation requirements while performing operational maintenance checks on the Post Accident Sampling System (PASS), and (b) inappropriate methodology for controlling the use of key locked valves for the valves in question.

Accordingly, the corrective actions cited below have been or will be implemented to ensure that similar violations will not recur in the future.

(1) A new Radiation Chemistry Procedure will be implemented to address use of the PASS while performing maintenance checks during power operational modes. This procedure will specifically address (a) initial conditions which allow PASS use, (b) proper administrative controls of all pertinent valves, and (c) initial and final valve line-up conditions. This procedure will require a Chemistry Technician verification and sign-off for as-left valve conditions. This action will be completed by August 31, 1984.

(2) The administration of keys used to operate SV-6529, 6507G, 6540G, and other similar containment isolation valves has been removed from the control of chemistry and maintenance groups and is currently controlled exclusively by Operations. This action was completed on January 30, 1984.

(3) A Facility Change Request has been initiated to modify the key function for SV-6529, 6507G, 6540G, and other similar containment isolation valves. The modification will incorporate a captive key feature such that the key can only be removed when the valve is in the closed position. This will result in more positive control of valve opening evolutions because Operations personnel will have control of the number and type of valve evolutions to be performed by Chemistry and Maintenance personnel. This action will be completed for Unit 1 during the spring 1985 and Unit 2 during the fall 1985 refueling outages.

(4) The administrative requirements for operation of SV-6529, 6507G, 6540G, and other similar containment isolation valves were reviewed with plant Chemistry, Operations, and Electrical & Controls personnel. This action was completed on April 4, 1984.

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION REPORT 50-317/84-01; 50-318/84-01

(5) Effective as of April 19, 1984, a license amendment was issued modifying Technical Specification Table 3.6-1 to allow intermittent operation (under Administrative Controls) of SV-6507G, 6540G, and other similar containment isolation valves.

(6) The General Supervisor - Operations Standing Instructions were modified on April 24, 1984, requiring the Control Room Operator to enter the status of these valves in the Control Room Log whenever the valves are opened.