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VICE PRESIDENT
NUCLEAR ENERGY
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May 22, 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
NRC Region I Inspection Report Nos. 50-317/92-07 and 50-318/92-07
(February 16, 1992 to March 28, 1992)

REFERENCE: (a) Appendix A (Notice of Violation) to NRC Region I Resident
Inspection Report Nos. 50-317/92-07 and 50-318/92-07 (February 16,
1992 to March 28, 1992), dated April 14, 1992

Gentlemen:

In response to Reference (a), Attachments (1) and (2) are provided. As discussed with Mr. Pete Wilson of the NRC Resident Staff, this response is provided within 30 days of our receipt of the referenced Notice of Violation rather than within 30 days of issuance as stated in the applicable inspection report.

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

Very truly yours,

GCC/EPW/epw/rcj/bjd

Attachments

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ATTACHMENT G.

IMPLEMENTATION OF TEMPORARY MODIFICATIONS WITHOUT POSRC REVIEW

I. DESCRIPTION AND CAUSE OF THE EVENT

On the morning of March 20, 1992, temporary alterations were installed to disable the automatic initiation of the Containment Spray Actuation Signal (CSAS) and the Containment Isolation Signal (CIS). Contrary to the requirements of Technical Specifications (TS) 6.5.1.7.d and 6.5.1.7.h, these changes were made without prior Plant Operations and Safety Review Committee (POSRC) review of a written safety evaluation.

Because certain accident conditions had been identified during an Electrical Distribution System Functional Inspection involving CSAS and CIS which might have caused Emergency Diesel Generator (EDG) overloading, all three EDGs were declared inoperable on March 19 and both Units were shutdown.

Following shutdown, Operations desired to remain in Mode 4 while reducing hydrogen gas concentrations in the reactor coolant. Since Unit 1 was entering a refueling outage, it was necessary to reduce hydrogen concentration to a safe level to permit subsequent opening of the reactor coolant boundary. However, EDG operability was required to remain in Mode 4. Since CSAS and CIS were not required to be operable in mode 4 and prompt restoration of EDG operability was desired, the temporary alterations to remove these signals were made in accordance with the "Emergency or exigent conditions" provision of Calvert Cliffs Instruction (CCI) 117, Temporary Modification Control.

The cause of this violation was an inadequate Calvert Cliffs Instruction. At the time of the event, CCI-117 permitted temporary modifications without prior POSRC review of a written safety evaluation, provided that an "emergency" or "exigent" condition existed. Because CCI-117 did not define "emergency" or "exigent" conditions, such conditions were interpreted to exist without realizing that a departure from TS requirements would occur when exercising this provision.

II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

CCI-117 was changed on March 27, 1992 to prevent the implementation of temporary modifications without prior POSRC review except in conditions authorized by 10 CFR 50.54(x). This more stringent criteria will ensure that all future modifications are either reviewed by POSRC or implemented under the guidelines of 10 CFR 50.54(x).

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

No additional actions are required to prevent future incidents of this type.

IV. DATE WHEN FULL COMPLIANCE ACHIEVED

Full compliance was achieved later on March 20, 1992 when the POSRC reviewed and recommended approval of the temporary modifications and the associated safety evaluation after their implementation.

ATTACHMENT (2)

INADEQUATE CORRECTIVE ACTION TO CONTROL TRANSIENT MATERIAL

I. DESCRIPTION AND CAUSE OF THE EVENT

Prior to the restart of Calvert Cliffs Unit 1 in 1990 after an extended outage, the Plant General Manager convened a Startup Review Board (SURB) to meet regularly and review issues of potential concern which might affect the safe restart of Unit 1.

As a result of one such concern, the SURB generated an open item to evaluate and implement actions to reduce the seismic threat posed by transient equipment. To address this concern, in November 1990, the Maintenance Superintendent published a Maintenance Superintendent Guideline (MSG) on transient material and conducted training with maintenance personnel. When SURB closed this item in February 1991, it recommended that control of transient materials should be addressed by a site-wide Calvert Cliffs Instruction (CCI). Because of its lower priority relative to other tasks, the proposed CCI had not been completed by April 1992, when this violation was cited.

Despite the issuance of the MSG and the training of maintenance personnel, transient material storage deficiencies were still observed in recent months. The major cause of these continued discrepancies was a lack of enforcement of the existing MSG, inadequate communication of management expectations to space owners, and an absence of detailed site-wide requirements for the control of transient material (such as will be contained in the site-wide instruction).

II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Nuclear Maintenance, Radiation Safety, Chemistry, and Operations personnel conducted a walkdown of their spaces to identify transient material deficiencies and due to increased awareness of this issue, continue to identify problems as they occur. The transient material deficiencies identified by these groups have been, or are being, corrected.

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

The commitment to create a site-wide instruction for this issue has been entered into the site action item tracking system to ensure its implementation by July 31, 1992. The new instruction will promulgate requirements for the control of transient material to be utilized by plant personnel when conducting work and performing space inspections. As part of the implementation process, training will be conducted with the appropriate organizations and supervision. In the interim, these requirements are being reemphasized to supervision.

Although this issue was not originally placed in the site tracking systems, the Issue Report system, implemented last summer, provides a mechanism to capture and address future issues and proposed corrective actions which are identified by groups like SURB.

IV. DATE WHEN FULL COMPLIANCE ACHIEVED

Full compliance will be achieved on or before July 31, 1992 when the new site-wide instruction for transient material control is implemented.