

OCT 9 1984

Docket Nos. 50-317
50-318

License Nos. DPR-53
DPR-69

Baltimore Gas and Electric Company
ATTN: Mr. A. E. Lundvall, Jr.
Vice President, Supply
P. O. Box 1475
Baltimore, Maryland 21203

Gentlemen:

Subject: Combined Inspection 50-317/84-09 and 50-318/84-09

This refers to your letter dated August 31, 1984, in response to our letter dated July 18, 1984.

Regarding your comment on the violation, your Technical Specification 6.8 requires written procedures for those areas specified in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Technical Specification 6.5.1.6 requires Plant Operations Safety Review Committee review of all procedures required by Specification 6.8. Section 10 of Appendix A of Regulatory Guide 1.33, states that "Extreme importance must be placed on laboratory procedures used to determine concentration and species of radioactivity in liquids and gases prior to release, including representative sampling, validity of calibration techniques, and adequacy of analyses." The procedures that were not POSRC reviewed relate to analysis and calibration, therefore, POSRC must review these procedures as required by Technical Specification 6.5.1.6. The violation remains.

In your August 31, 1984 letter, you indicated that you classify these procedures as "sub-tier" procedures and POSRC does not review sub-tier procedures. It is your choice to classify procedures; nevertheless, they must be reviewed by POSRC according to their content in order to conform to technical specification requirements.

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is required to submit to this office within thirty days of the date of this letter, a written statement or explanation in reply as described in the Notice of Violation accompanying the July 18, 1984 letter to Baltimore Gas and Electric Company.

Your cooperation with us is appreciated.

Sincerely,
Original Signed By:

8411090506 841009
PDR ADOCK 05000317
Q PDR

Thomas T. Martin, Director
Division of Engineering and
Technical Programs

OFFICIAL RECORD COPY

RL50-317/84-09 - 0001.0.0
09/28/84

1/0
IE06

OCT 9 1984

cc w/encl:

- R. M. Douglass, Manager, Quality Assurance
- L. B. Russell, Plant Superintendent
- S. M. Davis, General Supervisor, Operations QA
- Thomas Magette, Administrator, Nuclear Evaluations
- R. C. L. Olson, Principal Engineer
- J. A. Tiernan, Manager, Nuclear Power
- R. E. Denton, General Supervisor, Training and Technical Services
- Public Document Room (PDR)
- Local Public Document Room (LPDR)
- Nuclear Safety Information Center (NSIC)
- NRC Resident Inspector
- State of Maryland (2)

bcc w/encl:

- Region I Docket Room (with concurrences)
- Senior Operations Officer (w/o encls)
- DPRP Section Chief

RI:DETP *ms*
Struckmeyer/ms

ms
RI:DETP
Pasciak

ms
RI:DETP
Bellamy

9/28/84

10/1/84

10/2/84

OFFICIAL RECORD COPY

RL50-317/84-09 - 0002.0.0
09/28/84