

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-317/88-04
50-318/88-05

Docket No. 50-317
50-318

License No. DPR-53 Category C
DPR-69

Licensee: Baltimore Gas and Electric Company
P. O. Box 1475
Baltimore, Maryland 21203

Facility Name: Calvert Cliffs Nuclear Power Station

Inspection At: Lusby, Maryland

Inspection Conducted: February 11-12, 1988

Inspectors: *Cory Conklin* 3/14/88
C. Conklin Senior Emergency date
Preparedness Specialist, DRSS

Approved by: *W. J. Lazarus* 3/14/88
W. J. Lazarus, Chief, EPS, EP&RPB, DRSS date

Inspection Summary:
Inspection on February 11-12, 1988 (Report Nos. 50-317/88-04 and 50-318/88-05)

Areas Inspected: Special announced inspection by a region based inspector of conditions surrounding the classification, reporting, and response to an Alert which was declared on February 1, 1988.

Results: One apparent violation was identified. The licensee failed to follow the requirements of emergency procedure ERPIP 3.0, "Immediate Actions", which requires, in part, the notification of the emergency response organization and subsequent emergency response facility activation.

Details

1.0 Persons Contacted

- *J. Lemons, Manager, Nuclear Operations Department
- *A. Sundquist, General Supervisor, QC and Support
- *T. Forquette, Supervisor, Emergency Planning Unit
- *J. Piefer, Quality Assurance Engineer
- R. Chandlee, Shift Supervisor

*Indicates the licensee representatives who attended the exit meeting held on February 12, 1988.

2.0 Background

This special inspection was conducted to determine the facts behind an Alert which was declared by the licensee on February 1, 1988, and to determine if the event was correctly classified, reported and emergency response actions implemented in accordance with NRC regulations and conditions of the Calvert Cliffs operating licensee.

In performing this inspection, those persons directly involved were interviewed, and appropriate supporting documentation was reviewed in order to determine that sequence of events which occurred on February 1, 1988. The times noted in Detail 3 below, are reconstructed from the best available information from all these sources.

3.0 Sequence of Events

<u>DATE</u>	<u>TIME</u>	<u>EVENT</u>
2/1	1646	A fire was discovered in the Unit 2 annunciator panel located in the cable spreading room. The fire resulted in the loss of all control room annunciators. The fire was extinguished by an installed halon system and portable CO ₂ extinguishers.
	1656	(Time approximate) Fire extinguished.
	1700	(Time approximate) The Site Emergency Coordinator (SEC) and the Shift Supervisor recognized that the present conditions (loss of annunciators) would require an Alert declaration by 1746. The SEC held discussions with his staff as well as the Site Emergency Preparedness Coordinator regarding the appropriateness of the Alert classification for the conditions.
2/1/88	1746	Alert declared in accordance with the Emergency Action Levels. The licensee made the proper offsite notifications within the required time frames. Based

upon discussions with the EPC, the SEC elected not to fully implement the immediate actions required in procedure ERPIP 3.0. The actions not implemented were the notification and recall of augmentation staff, site accountability and emergency response facility activation.

1910 The visible portion of the annunciators was restored and the licensee secured from the Alert.

4.0 Findings

Based on the fact that the loss of annunciators did not significantly lessen the ability of the control room staff to recognize and respond to changing plant conditions (they were able to utilize the plant computer visual displays, printed alarms and the safety parameter display system, as well as actual indicators), the inspector concluded that this event posed no real threat to the health and safety of the public. Plant management assigned additional operators to monitor plant conditions throughout the period the annunciators were out of service.

The inspector identified areas in the licensee's response to the Alert that indicate weaknesses in licensee's procedures and training, particularly in the areas of classification and staff notification and augmentation. These areas will require review and corrective action by the licensee.

- Many of the Emergency Action Levels (EAL's) do not conform to the guidance of NUREG 0654. Some EAL's, such as the EAL used to declare the Alert, may not be appropriate at the levels they are presently being used at. The inspector noted that the licensee has revised the EAL's for loss of annunciators since the event. The licensee has agreed to evaluate symptoms, events, compatibility with the Emergency Operating Procedures, and validation of EAL's on the simulator as appropriate. This item is an Inspector Followup Item (IFI) (50-317/88-04-01 and 50-318/88-05-01).

The SEC, after consultation with the EPC, elected to declare an Alert, but not notify response staff nor activate the emergency response facilities. ERPIP 3.0, "Immediate Actions", does not allow the flexibility of selected response. ERPIP 3.0 requires the recall of all emergency response staff and subsequent facility activation. The inspector noted that the SEC did bring in selected staff to assist in communications, observe plant conditions and restore the annunciators. The SEC's rationale for not staffing was two fold. First he felt that the event did not pose a credible threat to the plant or the health and safety of the public, and secondly he felt that facility activation would have diverted control room staff attention, thereby raising the potential for a worsening of the situation. This flexibility is not permitted by the procedures. The reason for facility activation is to provide staff and expertise to

alleviate the control room workload and allow them to concentrate all their efforts on the safe operation or restoration of the plant. Based upon a review of the Alert classification and subsequent actions, the licensee has concluded that their decision not to notify staff and activate facilities was inappropriate. This is an apparent violation (See Appendix A) (50-317/88-04-02 and 50-318/88-05-02).

5.0 Exit Meeting

The inspector met with the licensee representatives listed in Section 1 of this report at the end of the inspection to discuss the scope and findings of this inspection as detailed in this report.

Licensee management acknowledged the findings and indicated that appropriate action would be taken regarding the identified open item.

At no time during this inspection did the inspectors provide any written information to the licensee.