



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

March 4, 1986

Docket No. 50-317/318

Baltimore Gas and Electric Company  
ATTN: Mr. A. E. Lundvall, Jr.  
Vice President - Supply  
Charles Center  
Post Office Box 1475  
Baltimore, Maryland 21203

Gentlemen:

SUBJECT: INSPECTION NOS. 50-317/85-22; 50-318/85-20

This refers to the team inspection conducted by Mr. G. T. Hubbard and other NRC representatives on September 9-13, 1985 at the Baltimore Gas and Electric Company (BG&E) headquarters, Baltimore, Maryland, and Calvert Cliffs Nuclear Power Plant, Units 1 and 2, Lusby, Maryland, of activities authorized by NRC License Nos. DPR-53 and DPR-69 and to the discussions of the team's findings with Mr. J. A. Tiernan and other members of your staff at the conclusion of the inspection. The inspection reviewed your implementation of a program as required by 10 CFR 50.49 for establishing and maintaining the qualification of electric equipment within the scope of 10 CFR 50.49 at Calvert Cliffs, Unit 2, including equipment qualification (EQ) corrective action commitments made as a result of the December 16, 1982 Safety Evaluation Report (SER) and the October 13, 1982 Franklin Research Center Technical Evaluation Report (TER). The inspection also included followup of Unit 1 findings identified during the October 15-19, 1984 equipment qualification inspection. Within this area, the inspection consisted of selected examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

The inspection determined that you have implemented a program to meet the requirements of 10 CFR 50.49 and your corrective action commitments relative to SER/TER deficiencies, except for certain deficiencies which are described in the attached inspection report. Five deficiencies in your program implementation, summarized in Appendix A, are classified as Potential Enforcement/Unresolved Items, and will be referred to the NRC Region I office for further action. One of these deficiencies, inadequate qualification of Rockbestos coaxial cable, was identified during the October 1984 inspection. Since the deficiency remains substantially unresolved, we are concerned about the timeliness and effectiveness of your corrective actions. The other deficiencies include failure to adequately establish qualification of Hatfield cable and an ASCO solenoid valve (plant I.D. #1SV3828); failure to comply with implemented procedures relative to changes/corrections to qualification files and review of field change requests (FCRs) for EQ equipment; and failure to establish plant maintenance procedures which incorporate qualification file maintenance cycling requirements for Limitorque motor valve operators. Eight

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other deficiencies are classified as open items. Your corrective actions concerning these items will be reviewed during a future NRC inspection. These open items include NRC concerns relative to equipment maintenance status, QA/QC audits, EQ training, equipment installation controls, Reliance motor maintenance, and qualification file (3) deficiencies. One open item (50-317/84-27-02) dealing with control of EQ files remains open from the October 1984 inspection. Details of the deficiencies are discussed in the enclosed inspection report.

In addition to the specific deficiencies discussed above, we are concerned with the apparent lack of adequate management attention with the establishment of a viable program to meet the requirements of 10 CFR 50.49. This concern was discussed during the exit meeting on September 13, 1985, and is evidenced by BG&E's failure to take appropriate action to establish qualification of Rockbestos coaxial cable even though the NRC inspectors identified this as a problem during the October 1984 inspection. Additional basis for this concern is that even after the October 1984 inspection, the NRC inspectors identified four Potential Enforcement/Unresolved Items (not counting Rockbestos cable) and eight open items during this inspection. When corrective action is taken on the deficiencies identified in the attached report these comments on management involvement should also be considered.

Your corrective actions regarding the identified deficiencies should not be delayed pending either a future NRC inspection or further action by the NRC Region I office.

We are available to discuss any questions you have concerning this inspection.

Sincerely,



Gary G. Zech, Chief  
Vendor Program Branch  
Division of Quality Assurance, Vendor  
and Technical Training Center Programs  
Office of Inspection and Enforcement

Enclosures:

1. Appendix A
2. Inspection Report Nos. 50-317/85-22  
and 50-318/85-20

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## APPENDIX A

### Potential Enforcement/Unresolved Items

As a result of the equipment qualification (EQ) inspection on September 9-13, 1985, the following items have been referred to NRC Region I as Potential Enforcement/Unresolved Items (paragraph references are to detailed portions of the inspection report).

1. Contrary to paragraph (f) and (j) of 10 CFR 50.49 Baltimore Gas and Electric Company (BG&E) had not demonstrated and/or documented the qualification of Rockbestos coaxial cable. (Paragraph 4.A.(9)(b), Items 50-317/85-22-02; 50-318/85-20-02)
2. Contrary to paragraph (f) and (j) of 10 CFR 50.49, BG&E had not demonstrated and/or documented the qualification of ASCO solenoid valve, model HCX8320A187. (Paragraph 4.D., Item 40-317/85-22-07)
3. Contrary to paragraph (j) of 10 CFR 50.49, BG&E did not adequately demonstrate and/or document qualification of the Hatfield 3 conductor cable. Under the option allowed by paragraph (k) of 10 CFR 50.49, this deficiency is contrary to section 8.0 of the DOR Guidelines. (Paragraph 4.E.(1), Items 50-317/85-22-10; 50-318/85-20-10)
4. Contrary to Criterion V of Appendix B to 10 CFR 50.49, BG&E had not complied with implemented procedures of Quality Assurance Procedure No. 7 (QAP-7) when making changes/corrections to qualification files. BG&E also failed to comply with requirements of procedure QAP-15 when they failed to perform a required EQ review of a field change request (FCR) for replacing flow control valve 1CV3828. (Paragraph 4.B.(2), Items 50-317/85-22-03; 50-318/85-20-03)
5. Contrary to Criterion V of Appendix B to 10 CFR 50.49, BG&E had not established plant maintenance procedures which incorporated the qualification file required EQ maintenance cycling requirements for Limitorque motor valve operators. (Paragraph 4.B.(6), Items 50-317/85-22-06; 50-318/85-20-06)