

SEP 16 1988

Docket Nos. 50-317
50-318

Baltimore Gas and Electric Company
ATTN: Mr. J. A. Tiernan
Vice President
Nuclear Energy
P. O. Box 1475
Baltimore, Maryland 21203

Gentlemen:

Subject: Inspection Nos. 50-317/88-10
50-318/88-11

We have received your letter dated July 21, 1988, in response to our letter dated June 21, 1988.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Ronald R. Bellamy

Ronald R. Bellamy, Chief
Facilities Radiological Safety
and Safeguards Branch

cc:

M. Bowman, General Supervisor, Technical Services Engineering
T. Magette, Administrator, Nuclear Evaluations
V. Bradley, Director, Security Services (Safeguards Only)
H. D. Coss, Vice President, General Services (Safeguards Only)
L. P. Gibbs, General Supervisor, Calvert Cliffs Security Operations
(Safeguards Only)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Maryland (2)

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bcc:
Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
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S. McNeil, LPM, NRR
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PAO (14) SALP Reports Only

RI:DRSS AW
Weadock/pmb

8/25/88

RI:DRSS
Shanbaky

9/6/88

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Smith
RI:DRSS
Bellamy

9/15/88

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

JOSEPH A. TIERNAN
VICE PRESIDENT
NUCLEAR ENERGY

July 21, 1988

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
Reply to NRC Inspection Report Nos. 50-317/88-10; 50-318/88-11

Gentlemen:

The subject inspection report identified one apparent violation of NRC requirements. Enclosure (1) to this letter is our reply to that report.

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

Very truly yours,

JAT/JMO/dlm

Enclosure

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
S. A. McNeil, NRC
W. T. Russell, NRC
D. C. Trimble/V. L. Pritchett, NRC
T. Magette, DNR

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ENCLOSURE (1)

REPLY TO NRC INSPECTION REPORT
50-317/88-10; 50-318/88-11

APPARENT VIOLATION

Appendix A to the report identified a failure to properly caution a respirator wearer prior to administering a respirator fit test.

BG&E Response

- I. Technical Specification 6.11 requires procedures for personnel radiation protection to be prepared consistent with requirements of 10 CFR 20. Additionally, it requires these procedures to be approved, maintained and adhered to for all operations involving personnel radiation exposure. Radiation Safety Procedure (RSP) 1-117, "Selection, Issuance and Wearing of Respiratory Protection Devices Used at CCNPP" addresses this requirement. It states that prior to administering the Stannic Chloride Smoke Test to a respirator wearer, the wearer should be cautioned to keep his eyes closed and to take shallow breaths.

A. Corrective Steps Taken and Results Achieved

BG&E identified that a Radiation Safety Technician (RST) administered the Stannic Chloride Smoke Test on April 26, 1988, to a respirator wearer without first properly cautioning that wearer.

From the follow-up investigations, the corrective actions taken were: the responsible RST was counselled and the details of this incident were reviewed with RSTs. In addition, a directive was issued by RST supervision to require all RSTs to review the Stannic Chloride Smoke Test Procedure with emphasis on proper cautioning. These actions were discussed with the Resident NRC Inspector and completed on May 15, 1988, for all, except two, RSTs. These two RSTs and all Dosimetry Technicians reviewed the procedure on May 12, 1988.

The Stannic Chloride Smoke Test is conducted by BG&E to detect poor respirator fit and/or poor respirator operation as recommended by NUREG-0041 and ANSI Z88.2-1980. The worker health and safety benefits arising from the use of this test significantly overshadow the minimal health risks associated with an inadvertent whiff of the smoke irritant. Incidents of inadvertent inhalation of the smoke irritant are rare.

Given the nature of the incident and noting we were involved with a multitude of activities associated with a refueling outage, the timeframe for completing the corrective actions was considered appropriate.

B. Corrective Steps Which Will be Taken to Avoid Further Violations

Lessons learned from this incident are being factored into General Orientation Training and Employee Requalification Training as appropriate.

ENCLOSURE (1)

REPLY TO NRC INSPECTION REPORT
50-317/88-10; 50-318/88-11

C. Date When Full Compliance Will be Achieved

BG&E was in full compliance with Technical Specification 6.11 upon completion of the review of the Stannic Chloride Smoke Test Procedure by Radiation Safety and Dosimetry Technicians on May 12, 1988.