

September 20, 1988

Docket Nos. 50-317; 50-318
License Nos. DRP-53; DPR-69
EA 88-202

Baltimore Gas and Electric Company
ATTN: Mr. J. A. Tiernan
Vice President, Nuclear Energy
Calvert Cliffs Nuclear Power Plant
Md. Rts. 2 and 4, Post Office Box 1535
Lusby, Maryland

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTIES
(NRC Inspection Report No. 50-317/88-17; 50-318/88-17)

This refers to the special NRC safety inspection conducted between June 27 and July 13, 1988 at Calvert Cliffs Nuclear Power Plant, Units 1 and 2, to review two operational events which occurred at your facility in June and July, 1988. The report of this inspection was sent to you on July 21, 1988. The two events, both of which were identified by members of your staff and reported to the NRC, involved violations of technical specification limiting conditions for operation (LCO). In one case, the LCO was violated in that certain technical specification limiting safety system settings were set at values less conservative than required. The violations are described in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty. On August 8, 1988 an enforcement conference was conducted with you and members of your staff to discuss the violations, their causes, and your corrective action.

The first violation involved the inoperability of one of the emergency diesel generators (EDG) for Unit 2, for approximately 48 hours in June 1988, while the reactor was at 100% power. During surveillance testing, Operations personnel assumed a malfunction in the diesel generator's automatic voltage regulator and they placed the voltage regulator in manual mode in order to complete the test. However, the voltage regulator was not returned to the automatic mode upon completion of the test. As a result, the violation occurred in that the diesel generator was rendered inoperable because it would not successfully power essential loads as required.

The second violation involved operation of the Unit 1 reactor at power in July 1988 while all the variable high level and axial offset Reactor Protective System instrumentation channels were inoperable for approximately 12 hours because their trip setpoints were less conservative than the limiting safety system settings described in the technical specifications. The violation occurred when operations personnel noted a 5% mismatch between nuclear instrumentation (NI) power indication at 17% and reactor coolant system (RCS) Delta T power indication at 22%, and the control room operator lowered the RCS Delta T power indication to coincide with the NI power indication. This is of particular concern because prior to taking this action, the operator was

OFFICIAL RECORD COPY

CP PKG CALVERT CLIFFS 9/15 - 0001.0.0
09/15/88

8810050031 880920
PDR ADOCK 05000317
Q PDC

IE14
11

not aware nor made any attempt to determine which power indication was correct. This adjustment was made with the supervisor's approval but without his realizing the magnitude of the change or the effect of this change on the limiting safety system settings, and without formal and administrative approval of what, in fact, constituted a temporary change to a procedure.

The NRC is particularly concerned that, in each case, operations personnel made changes to safety related equipment without understanding or determining the effects of these changes on the operability of the equipment, and without coordinating with, or seeking assistance from, technical support personnel. Furthermore, in making these changes, which were contrary to established procedures, operations personnel did not exhibit a proper safety attitude in that they were not sufficiently questioning or technically inquisitive while seeking resolution of these problems.

These events raise significant questions concerning the (1) the control of operations, and (2) the coordination and communication that exists between operations and technical support personnel. Furthermore, they provide another example of a continuing NRC concern, expressed during previous SALP evaluations, that your staff was, at times, slow to recognize the existence of potential safety issues and was not always effective in reviewing, evaluating, and resolving potential safety problems.

Accordingly, a need exists for better control of operations at Calvert Cliffs, and better coordination both within the operations department and among the departments to assure the reactors are operated safely in accordance with the technical specifications. To emphasize these needs, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Regional Operations, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of One Hundred Fifty Thousand Dollars (\$150,000) for the violations described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988) (Enforcement Policy), the violations described in the enclosed Notice have been individually categorized at Severity Level III.

Although the base civil penalty amount for a Severity Level III violation is \$50,000, the base civil penalty amount has been increased by 50% to \$75,000 in each case. With respect to the first violation, the penalty was increased by 50% because of your recent poor performance in the area of control of surveillance tests. For example, deficiencies in this area have caused (1) an event in 1987 in which all four sensor channels of the recirculation actuation systems were inoperable for 15 minutes due to improper isolation of all four switches during preparations for a surveillance test, and (2) problems encountered during testing of Auxiliary Feedwater pumps which resulted in a Confirmatory Action Letter being issued on November 2, 1987. With respect to the second violation, the penalty was increased by 50% because your staff should have known of the reduced ex-core NI signals resulting from the lower leakage two year core design. A similar situation had previously occurred at Unit 2 following the 1987 refueling and although your staff had been notified of the potential for

this type of problem by the NSSS vendor, they failed to adequately disseminate and use this information.

The other escalation and mitigation factors were considered and no further adjustment was considered appropriate.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,

Original Signed By
WILLIAM T. RUSSELL
William T. Russell
Regional Administrator

Enclosure: Notice of Violation and Proposed
Imposition of Civil Penalty

cc w/encl:

M. Bowman, General Supervisor, Technical Services Engineering
T. Magette, Administrator, Nuclear Evaluations
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)
 Management Assistant, DRMA (w/o encl)
 DRP Section Chief
 Robert J. Bores, DRSS
 SECY
 J. Taylor, DEDRO
 J. Lieberman, OE
 J. Luehman, OE
 W. Russell, RI
 D. Holody, RI
 L. Chandler, OGC
 Enforcement Directors, RII-III
 Enforcement Officers, RIV-V
 T. Murley, NRR
 F. Ingram, PA
 J. Bradburne, CA
 E. Jordan, AEOD
 B. Hayes, OI
 S. Connelly, OIA
 P. Robinson, OE
 F. Miraglia, NRR
 D. Nussbaumer, OGP/SP
 OE File (3 copies = 1trhd)
 EDO Rdg File
 DCS
 B. Clayton, EDO

RI:EO *WPH*
 Holody/mlb/tm/ms
 8/10/88

RI:DRP
 Tripp
 8/16/88

RI:DRP
 Wiggins
 8/17/88

RI:DRS
 Kater
 8/18/88

RI:RC *out*
 Gutierrez *si*
 8/ /88 *da*

RI:RA
 Altan
 8/18/88

RI:RA *WPH*
 Russell
 8/20/88

NRR
 Miraglia
 8/ /88

OGC
 Chandler
 8/ /88

OE
 Lieberman
 8/ /88

DEDRO
 Taylor

OFFICIAL RECORD COPY

CP PKG CALVERT CLIFFS 9/15 - 0004.0.0
 09/15/88

*Rec'd by
 phone for OE
 9/14 DPH*