



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

JOSEPH A. TIERNAN
VICE PRESIDENT
NUCLEAR ENERGY

May 17, 1986

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

License Nos.	DPR-53
	DPR-69
Docket Nos.	50-317
	50-318

ATTENTION: Mr. Thomas T. Martin, Director
Division of Radiation Safety and Safeguards

Gentlemen:

This refers to Inspection Report 50-317/86-05 and 50-318/86-05, which transmitted two items of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to those items noted in your letter of April 17, 1986.

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

Very truly yours,

JAT/SRC/dlm

Enclosure

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
D. H. Jaffe, NRC
T. Foley, NRC

8605270220 860517
PDR ADOCK 05000317
G PDR

IE-06 1/1

ENCLOSURE (1)

**REPLY TO APPENDIX A OF NRC
INSPECTION REPORT 50-317/86-05; 50-318/86-05**

ITEM A

At the time of the inspection, the computerized chest counter was in use to supplement approved procedures for identifying personnel having potential internal contamination. The chest counter identifies those personnel whose counts are statistically greater than background levels and instructs the operator to perform, as necessary, whole body counts using an approved procedure in accordance with Technical Specification 6.8.1.a. The chest counter was not used to perform analytical measurements to assess internal intakes.

This use of a draft procedure was identified as a deficiency by the Baltimore Gas and Electric (BG&E) Company prior to the inspection during a recent Quality Assurance audit. This fact was communicated by Mr. E. H. Roach of our staff, to Mr. J. J. Kottan of your staff, prior to the exit meeting. A commitment was made to our internal Quality Assurance organization prior to the NRC inspection to formalize the procedure for the operation of the chest counter. This draft procedure will be approved and implemented by June 1, 1986. Because this is a licensee-identified item, which will be corrected under existing BG&E programs, and because we believe this screening procedure is not required to comply with existing regulations, we request you reconsider issuing the subject violation.

ITEM B

We have reviewed the circumstances that led to the apparent violation of Technical Specifications 4.6.3.1, 4.6.6.1, 4.7.6.1, 4.7.7.1, and 4.9.12. This event was caused by an apparent misinterpretation of the Surveillance Requirements and a miscommunication with the contractor involved. Accordingly, the corrective action stated below will be implemented to ensure that similar violations will not recur in the future.

The appropriate procedures will be revised to ensure that two separate samples are analyzed in accordance with the Surveillance Requirements. In addition, our contracts with outside laboratories will be altered to ensure that two distinct laboratory analyses are performed. These changes will be made by September 1, 1986.

Furthermore, we are considering submitting a license amendment request that changes the applicable Technical Specifications such that only one analysis is required of the charcoal sample. The procedures will then be revised again if a new Surveillance Requirement is issued.