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Nuclear Energy

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 495-4455

BGE

January 5, 1998

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
NRC Region I Integrated Inspection Report Nos. 50-317/97-06 and 50-318/97-06 and Notice of Violation

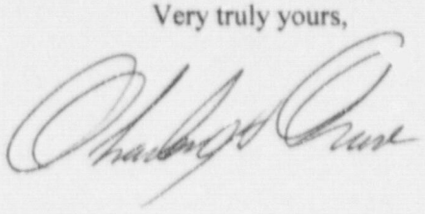
REFERENCE: (a) Letter from Mr. L. T. Doerflein (NRC) to Mr. C. H. Cruse (BGE), dated December 5, 1997, NRC Region 1 Integrated Inspection Report Nos. 50-317/97-06 and 50-318/97-06 and Notice of Violation

This letter provides Baltimore Gas and Electric Company's response to Reference (a), which identified six violations. Each of the violations cited has been individually addressed as specified in the Enclosure to Reference (a). Individual responses to each of these violations are provided in Attachments (1) through (6).

IE01

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

Very truly yours,



STATE OF MARYLAND :
: **TO WIT:**
COUNTY OF CALVERT :

I, Charles H. Cruse, being duly sworn, state that I am Vice President, Nuclear Energy Division, Baltimore Gas and Electric Company (BGE), and that I am duly authorized to execute and file this response on behalf of BGE. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other BGE employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of Calvert, this 5th day of January, 1998.

WITNESS my Hand and Notarial Seal:

Denise D. Snuka
Notary Public

My Commission Expires:

2/2/98
Date

CHC/CDS/bjd

Attachments

cc: R. S. Fleishman, Esquire
J. E. Silberg, Esquire
Director, Project Directorate I-1, NRC
A. W. Dromerick, NRC
H. J. Miller, NRC
Resident Inspector, NRC
R. I. McLean, DNR
J. H. Walter, PSC
L. T. Doerflein, NRC

ATTACHMENT (1)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-01

A. *10 CFR 50.59 allows the holder of a license to make changes to the facility as described in the safety analysis report, without prior commission approval, unless the proposed change involves an unreviewed safety question. 10 CFR 50.59(b)(1) requires that the licensee maintain records of changes and that these records include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question. 10 CFR 50.71(e) requires that licensees periodically update the final safety analysis report to assure that the report contains the latest material developed.*

Contrary to the above, as of October 15, 1997, the screening for the installation of a 5600 gallon ammonium hydroxide storage tank, installed in 1986 and reviewed by Baltimore Gas and Electric Company (BGE) in 1996, failed to include a written safety evaluation which provided the determination that the change did not involve an unreviewed safety question. The hazardous material consequence of a spill of ammonia as described in the December 30, 1980, BGE letter to the NRC, referenced in the Updated Final Safety Analysis Report Section 1.8, Subsection III.D.3.4, and Updated Final Safety Analysis Report (UFSAR) Figure 1-2 were revised by the installation of the tank. As a result of not completing a safety evaluation, BGE also failed to update the final safety analysis report.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Baltimore Gas and Electric Company accepts the violation. We agree that Figure 1-2 of the UFSAR should have been updated. Treatment of information incorporated by reference in the UFSAR is a current industry topic. We plan to implement recently issued Nuclear Energy Institute guidance on this topic in accordance with the schedule described below.

II. REASONS FOR THE VIOLATION

In 1997, a modification was issued to replace the 5600 gallon ammonia tank with an 8500 gallon ammonia tank and increase the ammonia concentration. This modification addressed all technical issues (e.g., chemical spills, Control Room habitability), but responsible personnel failed to notice that the tank was indicated on the site plot plan. Therefore, the need to perform a 50.59 analysis was not identified. In addition, the fact that the tank was incorrectly identified as a morpholine tank was also not noticed and corrected.

In 1991, we incorporated information summarizing certain Nuclear Regulatory Commission-issued Safety Evaluation Reports such as those relating to NUREG-0737. These summaries included references to the specific correspondence. Section 1.8, Subsection III.D.3.4 and its reference to BGE's 1980 letter noted in this violation, was one case of this added material. These references were intended to guide future reviewers to relevant documents. It was not our intent that all information contained in these documents was to be considered "described in the Safety Analysis Report" when screening the subjects for 10 CFR 50.59 applicability.

ATTACHMENT (1)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-01

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

A detailed safety evaluation has been performed to ensure that the ammonia tank does not represent an Unreviewed Safety Question, and pending changes to UFSAR Figure 1-2 have been issued.

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Over the past several years, extensive emphasis has been placed on ensuring changes to our facility are conservatively reviewed for 10 CFR 50.59 applicability. In order to ensure that design engineers are aware of the detail contained in the UFSAR Site Plan, training will be conducted concerning the details of this issue. In addition, we will conduct training of 50.59 reviewers to enhance awareness of those topics contained in Section 1.8 of the UFSAR.

Industry guidance has recently been issued by the Nuclear Energy Institute regarding 10 CFR 50.59. The Nuclear Energy Institute guidance directly addresses treatment of information incorporated by reference in the UFSAR. We plan to implement this document by June 30, 1998. In addition, a detailed review of the Calvert Cliffs UFSAR is currently in progress to identify and correct any inaccuracies. This review includes evaluating incorporation of information from past NRC Safety Evaluation Reports. This review is expected to be completed by October 1998. The majority of UFSAR corrections that result from this review should be incorporated into the 1998 and 1999 revisions to the UFSAR. These steps will clarify our expectations for application of 10 CFR 50.59.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

We were in full compliance when the detailed safety evaluation was completed for the ammonia tank. All pending changes to the UFSAR with regard to this issue have been completed. We plan to implement the Nuclear Energy Institute guidance regarding 10 CFR 50.59 by June 30, 1998.

ATTACHMENT (2)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-02

B. Calvert Cliffs Technical Specification 6.4.1 states that written procedures be established and implemented, covering the activities referenced in Appendix A of NRC Regulatory Guide 1.33, Revision 2, dated February 1978. The regulatory guide includes in Section 6 (r), Procedures for Combating Emergencies and Other Significant Events, including, Other Expected Transients that may be Applicable.

Contrary to the above, as of October 15, 1997, BGE had neither established nor implemented a procedure for combating a spill from an ammonia storage tank located within the protected area boundary. Specifically, following a postulated ammonia spill, actions for combating the spill including alignment of control room ventilation, personnel response, and the need for self-contained breathing apparatus, had not been established into written procedures.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Baltimore Gas and Electric Company accepts the violation.

II. REASONS FOR THE VIOLATION

Engineering and chemistry procedures were not adequate to ensure changes to chemical concentrations, quantities, or storage conditions within the protected area were assessed to determine if changes to emergency procedures were required. As a result, the personnel responsible for the development of emergency procedures used to respond to possible ruptures/breaks in the ammonia tank were not notified of the potential need for a chemical-specific response procedure for the new ammonia tank.

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

Revisions 20 and 21 have been processed to Emergency Response Plan Implementation Procedure 3.0, "Immediate Actions." These revisions changed Attachment 19, Hazardous Material Release/Spill. Steps have been added to Attachment 19 to assess Control Room habitability for the presence of ammonia or any other chemical at the onset of a hazardous material release/spill. Action is prescribed in the event a chemical odor is present. Additionally, this revision identifies the location of respiratory equipment should it be needed.

Special training has been provided to Operations personnel on the use of self-contained breathing apparatus. This training identified the location of self-contained breathing apparatus and provided practical experience with self-contained breathing apparatus donning and activation. The object of this special training was to promptly re-familiarize operators in the use of self-contained breathing apparatus.

Self-contained breathing apparatus training program will be revised. The revised program will include practical experience with self-contained breathing apparatus donning and activation on an annual basis.

ATTACHMENT (2)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-02

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

To avoid further violations of this nature, revisions will be made to appropriate engineering and chemistry procedures. Provision will be made to initiate an assessment of chemical spill response procedures any time analysis determines that greater than 50 percent of a chemical's toxicity level can be realized in the Control Room. The assessment will evaluate whether additional measures are needed for Control Room response to the chemical in question.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the revisions to Emergency Response Plan Implementation Procedure 3.0, Attachment 19.

ATTACHMENT (3)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-04

C. *Calvert Cliffs Technical Specification 6.4.1 states that written procedures shall be established and implemented covering the activities recommended in Appendix A of NRC Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Section 7,(e)(4) provides for radiation protection procedures for contamination control.*

Contrary to the above, as of November 1, 1997, BGE had neither established nor implemented a procedure that provided contamination control from laundered and re-used anti-contamination clothing.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Baltimore Gas and Electric Company accepts the violation.

II. REASONS FOR THE VIOLATION

The Radiation Safety Procedure (RSP) 2-406, Revision 2, Laundering of Contaminated Clothing, did not describe actions to be taken by equipment operators when stated acceptance criteria were exceeded, other than to report the results to a Radiation Safety supervisor. The procedure lacked criteria for increasing the sample size or dispositioning laundry when a high failure rate of monitored clothing was observed. The failure rate was used to assess the laundry vendor's performance. The contamination levels detected on clothing failing the monitoring was not assessed to determine if a personnel hazard existed or if the acceptance criteria for laundering of anti-contamination clothing (no significant skin contamination) could be exceeded. During April 1997, Radiation Safety Technicians and contractor personnel performing laundry monitoring in accordance with RSP-2-406 failed to document the high rate of failure of protective clothing (primarily boots of various sizes), returned from a laundry vendor. The personnel failed to elevate the issue to the appropriate level of supervision for a decision on corrective actions and the dissemination of information to affected site personnel. The NRC Resident Inspector identified other dates in April, May, and August 1997, where during the monitoring of the laundry, numerous articles failed the monitoring threshold/acceptance criteria.

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The following immediate corrective steps were taken:

A. An issue report (IR1-041-829) was written on November 17, 1997, and a procedural change was initiated.

B. A formal root cause analysis for this event commenced.

C. An immediate change to RSP 2-406 was implemented on November 25, 1997, to incorporate actions that included instructions to expand the sample size of monitored articles when an acceptable failure rate is exceeded. This procedure was also revised to provide instructions related to appropriate disposition of the monitored articles. The procedure does not allow release of anti-contamination clothing for use in the radiological controlled area until monitoring is completed for the appropriate articles.

D. Awareness training was given to all Materials Processing personnel concerning the specifics of this issue.

VIOLATION 97-06-04

Since the immediate change to RSP 2-406 went into effect on November 25, 1997, we have had no similar events at Calvert Cliffs.

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

We are revising the appropriate procedures to incorporate an improved statistical sample determination inspection criteria and frequency. Additionally, the requirements for actions to be taken by both workers and supervisors, when acceptance criteria are exceeded, will be reviewed and revised throughout the Radiation Safety Procedures as part of the procedure upgrade initiative. All appropriate Radiological Protection personnel will be trained on the revised procedures. We will conduct an effectiveness review of the revised procedures, as appropriate. If additional corrective steps result from the root cause analysis, they will be implemented, as appropriate.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on November 25, 1997, when an immediate change to RSP 2-406 was implemented.

ATTACHMENT (4)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-06

D. 10 CFR 20.1501 states that each licensee shall make or cause to be made, surveys that may be necessary to comply with the regulations in this part, and are reasonable to evaluate the potential radiological hazard that may be present. 10 CFR 20.1204 states that for the purpose of assessing dose, licensees shall take suitable measurements of concentrations of radioactive materials in air in work areas.

Contrary to the above, on September 16, 1997, during seal replacement of the 11B Reactor Coolant Pump, the air samples were not collected in a suitable location that would be representative of the airborne radioactivity to which affected workers were exposed as necessary to comply with 10 CFR 20.1204

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Baltimore Gas and Electric Company accepts the violation.

II. REASONS FOR THE VIOLATION

The reasons for this violation are as follows:

A. Personal Air Samplers were not used to monitor for potential airborne radioactivity as there was no clear management expectation to use these instruments.

B. The Radiation Safety Technician, at the job site, did not use conservative decision-making to position the air sampler in the location where the highest radioactive airborne contamination could potentially be present.

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The following immediate corrective steps were taken:

A. An Issue Report was initiated on September 18, 1997, documenting the event and the immediate actions taken.

B. Affected personnel were whole body counted. The results showed that each affected worker received less than 0.1 percent of their annual limit of intake.

C. A root cause analysis of the event was commenced.

D. Radiation Safety Technicians were trained on the use of the Buck Simple Sampler Personal Air Samplers, and this instrument is being employed on designated jobs to collect breathing zone air samples. This training included clearly defined management expectations on the use of personnel air samplers.

No similar events have occurred at Calvert Cliffs since September 16, 1997.

VIOLATION 97-06-06

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The following corrective steps will be taken to avoid further violations:

A. Procedures are being revised to strengthen criteria for taking representative air samples.

B. All Radiation Safety Technicians will be trained on this event and the importance of ensuring that representative air samples are obtained.

C. We will conduct an effectiveness review of the training discussed above.

If additional corrective steps result from the root cause analysis, then they will be implemented as appropriate.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the completion of the training on December 16, 1997.

ATTACHMENT (5)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-05

E. Technical Specification 6.4.1 states that written procedures shall be established and implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2. Appendix A of Regulatory Guide 1.33, Revision 2, Section 7.e.(1) lists access control to radiation areas including a radiation work permit system. The Calvert Cliffs Radiation Safety Manual, Revision 1. Sections 6.2.1.3.e and 6.2.1.2.6 require that each person working under a specific special (radiation) work permit (SWP) comply with the specific special work permit in all respects.

SWP No. 802, task C (remove/replace 11B Reactor Coolant Pump [RCP] seal) specified full protective clothing dress plus water resistant outer clothing, face shield, kneepads, and extra boots and gloves.

SWP No. 11, task C (Inspections and minor maintenance in all areas following a reactor trip) specified that in the absence of respiratory protection or facial anti-contanmination clothing (Anti-Cs), the thermoluminescent detector be worn on the outside of the Anti-Cs, with the beta window not covered.

1. Contrary to the above, on September 16, 1997 during seal replacement of the 11B RCP, a worker actively performing radiological work as authorized by SWP 802, task C, was not wearing the protective clothing as specified by the SWP, in that the individual did not wear a face shield or water resistant outer clothing though engaged in handling the RCP seal container, and spraying the seal with water to minimize airborne radioactivity.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Baltimore Gas and Electric Company accepts the violation.

II. REASONS FOR THE VIOLATION

On the morning of September 16, 1997, a pre-job brief was held with a team of personnel from Major Machinery, the responsible maintenance group assigned to replace the No. 11B RCP seal, Plant Engineering, and Radiation Safety. The job steps for the evolution were discussed during the brief, along with the specific radiological requirements for each task heading in the SWP to be used (SWP No. 802, "Removal/Replace Seal" headings A, B, and C). The dress-out requirements for each specific job step were not discussed. The Major Machinery craft were signed-in under Section C of SWP No. 802, "Removal/Replace Seal." The dress requirements for this section included full Anti-Cs with water resistant outer clothing, face shield, kneepads, extra boots, and gloves. The Major Machinery Supervisor was signed in under Section A of SWP No. 802, "Support Activities." The dress requirements for this section only required full Anti-Cs. The supervisor was signed in under this section throughout the entire seal replacement evolution.

During the brief, the team discussed how the Major Machinery craft would remove the seal, place it in the canister, and remove it from the RCP bay. The team discussed how the supervisor would be inside the pump bay stationed outside of the RCP shroud and would perform support activities such as providing oversight, procedure control, and even the handing of tools to workers inside the shroud. The team did not discuss or consider the potential for the supervisor to perform job steps that were supposed to be performed by the craft.

After entering the containment, two mechanics from the Major Machinery crew went into the shroud area to pull the seal. A third mechanic was stationed outside of the shroud next to the seal canister. The supervisor was stationed outside of the shroud on the opposite side of where the canister was located. The seal was pulled and moved to a location next to the canister. Due to the heat and humidity, the first crew became fatigued and the decision was made to bring in the standby crew. The supervisor, concerned with environmental conditions and exposure from the seal, requested and received permission to perform hands-on job steps associated with removing the seal from the pump bay. This was a deviation from what was discussed at the brief (i.e., the craft was to perform all hands-on activities).

Section C of the SWP No. 802 was written to address job steps associated with removing and replacing the RCP seal, but did not clearly state this included all hands on work in the RCP bay. The work supervisor was not appropriately dressed nor signed-in under Section C when he performed hands-on work. If the potential for the supervisor to perform hands-on work had been identified prior to the start of the seal removal/replacement evolution, a decision should have been made to have the supervisor sign in under Section C of the SWP. Instead, the supervisor and the Radiation Safety Technician made the inappropriate decision in the field to allow the supervisor to perform hands-on job steps under Section A of the SWP.

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

Calvert Cliffs procedures RSP 1-106 and MN-1-100 both contain guidelines for conducting pre-job briefs. These guidelines state assigned individuals and specific roles and responsibilities should be discussed during pre-job briefs.

The Plant General Manager issued specific expectations via a site memo stating roles and responsibilities for high radiation area pre-job briefs. Effective December 15, 1997, a first line supervisor is expected to: (1) attend every high radiation area pre-job brief that affects their business function; (2) actively participate in the brief to ensure success from safety, quality, and coordination standpoints; and (3) provide feedback on how the job went and whether attendance had a positive impact on improving the overall work process within the radiological controlled area. The supervisor is expected to discuss specific roles and responsibilities, survey results, as well as conditions that may require work to be stopped or necessitate the need for contingency plans.

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

To ensure all personnel who perform hands-on work in the RCP bays associated with the removal and replacement of an RCP seal are adequately dressed, future RCP seal replacement SWPs will be written to clearly state the specific activities that can be performed under each section of the SWP.

Site Supervision will conduct tailgate training with workers who have access to the radiological controlled area to stress the importance of SWP adherence in the field.

Additionally, we are currently conducting a root cause analysis of this event. Additional applicable corrective actions will be developed and implemented as necessary.

ATTACHMENT (5)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-05

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on December 15, 1997 with the issuance of the Plant General Manager's memo.

ATTACHMENT (6)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-06 AND 50-318/97-06

VIOLATION 97-06-07

E. *Technical Specification 6.4.1 states that written procedures shall be established and implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2. Appendix A of Regulatory Guide 1.33, Revision 2, Section 7.e.(1) lists access control to radiation areas including a radiation work permit system. The Calvert Cliffs Radiation Safety Manual, Revision 1, Sections 6.2.1.3.e and 6.2.1.2.6 require that each person working under a specific special (radiation) work permit (SWP) comply with the specific special work permit in all respects.*

SWP No. 802, task C (remove/replace 11B Reactor Coolant Pump seal) specified full protective clothing dress plus water resistant outer clothing, face shield, kneepads, and extra boots and gloves.

SWP No. 11, task C (Inspections and minor maintenance in all areas following a reactor trip) specified that in the absence of respiratory protection or facial anti-contamination clothing (Anti-Cs), the thermoluninescent detector (TLD) be worn on the outside of the Anti-Cs, with the beta window not covered.

2. Contrary to the above, on October 24, 1997 during an initial containment entry following a reactor trip, two radiation safety technicians performing radiological work authorized by SWP 11, task C, were not wearing either respiratory protection or their TLDs on the outside of the Anti-Cs, with the beta window not covered.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Baltimore Gas and Electric Company accepts the violation.

II. REASONS FOR THE VIOLATION

The reasons for this violation are as follows:

A. The two Radiation Safety Technicians (RSTs) involved with this event failed to follow the requirements stated in the applicable Special Work Permit (No. 97-11), specifically, "in the absence of Respiratory Protection or Facial Anti-Cs, the thermoluminescent detector (TLD) is to be worn on the outside of the Anti-Cs." The two RSTs did not practice the "Stop, Think, Act, and Review," (STAR) principle and did not perform self-checking.

B. A copy of the applicable SWP (No. 97-11) was not present at the Unit 1 Containment personnel air lock, as required.

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The following immediate corrective steps were taken:

A. The two affected RSTs moved their TLDs to the outside of their protective clothing, as required by SWP No. 97-11.

B. An Issue Report was initiated on October 24, 1997, documenting the event and the immediate action taken.

C. A root cause analysis of the event is complete.

No similar events have occurred at Calvert Cliffs since October 24, 1997.

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The following corrective steps will be taken to avoid further violations:

A. Appropriate Radiation Safety personnel will be provided training on using the STAR principle.

B. Appropriate personnel action was administered.

C. Copies of SWPs will be located at the appropriate areas in the RCA.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on October 24, 1997, when the two affected RSTs moved their TLDs to the outside of their protective clothing, as required by SWP No. 97-11.