

JUN 13 1986

Docket Nos. 50-317  
50-318

License Nos. DPR-53  
DPR-69

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. 50-317/86-05 and 50-318/86-05

This refers to your letter dated May 17, 1986, in response to our letter dated April 17, 1986.

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.

With regard to Item A, we have reviewed your audit report, dated April 17, 1986, for the Quality Assurance Audit QAP-8 (Dosimetry and Respiratory Protection) performed February 11 through March 17, 1986. This audit includes Finding Number 86-09-02, failure to have an approved procedure for operation of the standup whole body counter. Although this audit was ongoing during our inspection of March 3-7, 1986, it was not documented until after completion of our inspection. Discussion by the NRC Resident Inspector with the QA auditor on May 28, 1986, indicated that this item was identified prior to the beginning of our inspection. Therefore, Item A meets all of the requirements of 10 CFR 2, Appendix C, for a violation for which the NRC will not generally issue a notice of violation: (1) it was identified by the licensee; (2) it fits in Severity Level IV or V; (3) it was reported, if required; (4) it was or will be corrected, including measures to prevent recurrence, within a reasonable time; and (5) it was not a violation that could reasonably be expected to have been prevented by the licensee's corrective action for a previous violation. Item A is retracted. We will modify our records accordingly.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Thomas T. Martin

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

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
TEO/

cc :

M. Bowman, General Supervisor, Technical Services Engineering  
Thomas Magette, Administrator, Nuclear Evaluations  
Daniel Latham, Director, Security Services (Safeguards Only)  
Norman J. Bowmaker, Vice President, General Services (Safeguards Only)  
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NRC Resident Inspector  
State of Maryland (2)

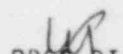
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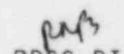
Region I Docket Room (with concurrences)  
Management Assistant, DRMA (w/o encl)  
DRP Section Chief  
M. McBride, RI, Pilgrim  
T. Kenny, SRI, Salem  
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DRSS:RI  
Kottan/pj  
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DRSS:RI  
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CHARLES 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
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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~~

## 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.