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February 26, 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
Reply to a Notice of Violation -- NRC Region 1 Integrated Inspection Report
Nos. 50-317/97-07 and 50-318/97-07 and Notice of Violation

REFERENCE: (a) L r from L. T. Doerflein (NRC) to C. H. Cruse (BGE), dated
January 27, 1998, NRC Region 1 Integrated Inspection Report
Nos. 50-317/97-07 and 50-318/97-07 and Notice of Violation

In response to Reference (a), Attachment (1) is provided.

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

Very truly yours,

CHC/RCG/bjd

Attachment

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, FSC
L. T. Doerflein, NRC

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ATTACHMENT (1)

NRC REGION 1 INTEGRATED INSPECTION REPORT NOS. 50-317/97-07 AND 50-318/97-07 AND NOTICE OF VIOLATION

VIOLATION 97-07-02

- A. *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, Quality Assurance Program Requirements, Revision 2. Section 7.e.(1) of Regulatory Guide 1.33 specifies radiation protection procedures for access control to radiation areas including a radiation work permit system. The Calvert Cliffs Radiation Safety Manual, Revision 1, Sections 6.2.1.2.b requires that each person working under a special work permit (SWP), comply with the SWP in all respects. SWP Number 100, Task A, "Shuffle Fuel within the Spent Fuel Pool," specified a survey once per shift while working in the spent fuel pool area.*

Contrary to the above, on September 11, 1997, a radiation survey was not done during the shift when plant operators worked in the spent fuel pool area under SWP Number 100.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Baltimore Gas and Electric Company accepts the violation.

II. REASONS FOR THE VIOLATION

On September 11, 1997, from 1215 to 1325 hours, fourteen Plant Operations personnel conducted training on the Spent Fuel Pool Handling Machine in the Unit 1 Spent Fuel Pool. The Operations personnel had checked in with the Radiation Control Special Work Permit Coordinator. Based on the information provided by Operations personnel that they would be training on the Spent Fuel Pool Handling Machine and were not going to shuffle fuel, the Special Work Permit Coordinator instructed the Operations personnel to sign into the Radiological Controlled Area under Special Work Permit (SWP) 97-100, "Shuffle Fuel within the Spent Fuel Pool, Not to be used for Refueling Operations." Special Work Permit 97-100 required that a radiation survey be conducted once per shift while working. Radiation Control personnel did not consider the training activity performed by the Plant Operators on September 11, 1997 to be work, therefore, the Special Work Permit Coordinator and Radiation Control Shift Supervisor did not assign Radiation Safety Technician coverage and no radiological surveys were performed.

III. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

- A. We have instructed the appropriate Radiation Safety personnel that all evolutions conducted in accordance with a SWP are to be considered as work.
- B. We have created a specific SWP that allows for operation of the Spent Fuel Pool Handling Machine without shuffling (moving) fuel. On January 2, 1998, SWP 98-127, Revision 0, "Work inside the Spent Fuel Pool Area," was issued and requires continuous Radiation Safety Technician coverage. Special Work Permit 98-127, Revision 0, does not permit fuel movement; however, the additional instructions of this SWP does permit, in part, Spent Fuel Pool handling machine movement, and raising and lowering the Spent Fuel Pool Handling Machine mast.

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NRC REGION 1 INTEGRATED INSPECTION REPORT
NOS. 50-317/97-07 AND 50-318/97-07 AND NOTICE OF VIOLATION

VIOLATION 97-07-02

- C. We verified that no fuel shuffling (movement) was conducted on September 11, 1997. The Nuclear Regulatory Commission Resident Inspectors at Calvert Cliffs were informed of this fact on January 9, 1998.

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

- A. Appropriate Radiation Safety personnel will be trained on the cause and corrective actions for this event.
- B. We will perform an effectiveness review of our corrective actions.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on September 11, 1997, at approximately 1325 hours when the Plant Operators exited the Spent Fuel Pool area upon completion of their training activity.