

APPENDIX A

Notice of Violation

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
Units 1 and 2

Docket/License Nos.: 50-317; DPR-53
50-318; DPR-69

As a result of the inspection conducted on February 21 - April 3, 1989, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) the following violations were identified:

- A.1 Technical Specifications 6.8.1.e and f requires respectively, that written procedures shall be implemented for the Emergency Plan and Fire Protection Programs.

Emergency Procedure ERPIP 3.1, Immediate Actions - Fire, requires, in part, that control room personnel will notify on site personnel of a reported fire by sounding the emergency alarm, announcing the location of the fire and notifying the Fire Brigade Leader by radio pager. Calvert Cliffs Instruction CCI-133 J, Calvert Cliffs Fire Protection Plan, Section VII.A, Fire Fighting Procedures - Personnel Responsibilities, requires, in part, that when notified that a fire exists, the control room operator shall sound the emergency alarm, announce the location of the fire over the public address system, and notify the Fire Brigade Leader of the fire.

Contrary to the above, at 4:47 p.m. on March 1, 1989, a fire occurred in a handswitch located on a Unit 2 control room panel and the control room personnel failed to sound the emergency alarm, announce the location of the fire and notify the Fire Brigade Leader by radio pager of the condition.

This is a Severity Level V Violation (Supplement VIII) applicable to DPR 69.

- A.2 Technical Specification Surveillance Requirement 4.7.8.1.c specifies that a representative sample of 10% of each type of safety related snubbers in use in the plant be tested either in place or in a bench test at least once per 18 months during shutdown.

Contrary to the above, between November 22, 1985 and March 25, 1989, a period that exceeded 18 months, the surveillance testing of six safety related snubbers that were required to be tested as part of the representative sample of 10% of each type of snubber in use in the plant could not be considered to have been performed in that supporting documented test performance did not exist.

This is a Severity Level IV Violation (Supplement I) applicable to DPR 69.

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- A.3 Technical Specification 6.8.1 states that written procedures shall be established and implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2.

Appendix A of Regulatory Guide 1.33, Revision 2, requires procedures for operations, maintenance of safety-related equipment, and for implementation of Technical Specification surveillances. Additionally, Surveillance Test Procedure (STP) 0-7-1, Engineered Safety Features Monthly Logic Test, Attachment 1, Part II, requires the safety injection actuation system block feature be reinstated after performing the planned sections of the procedure. Operating Instruction (OI) 34, Section IX, Returning Actuation Logic Cabinets to Operation, requires that a specific sequence be followed in order to return Logic Cabinet "B" to service. Operating Instruction 13, Section IV, Condenser Air Inleakage Check Taken At Common Discharge Header, requires the vacuum pump manual three-way valve be shifted to the separator position.

Contrary to the above, the following examples represent licensee failures to establish or implement required procedures:

- (1) On March 19, 1989, personnel performing STP 0-7-1, Attachment 1, Part II, failed to follow the steps in the procedure which required the safety injection actuation system block feature be reinstated which resulted in a engineered safety features actuation.
- (2) On March 20, 1989, personnel performing OI-32, Section IV, failed to follow the sequence of steps in the procedure which resulted in a partial engineered safety features actuation.
- (3) On March 7, 1989, personnel performing OI-13, Section IV, failed to follow the steps in the procedure regarding positioning of the vacuum pump manual three-way valve which resulted in a partial loss of condenser vacuum.
- (4) On March 1, 1989, personnel performing maintenance on #22 Auxiliary Feedwater Pump throttle/trip valve failed to establish procedures, which resulted in improper assembly and a fire in the trip circuitry of the throttle/trip valve.

In the aggregate, this is a Severity Level IV violation (Supplement I) applicable to DPR 53 and 69.

- A.4 Technical Specification 6.5.1.6.g specifies that the Plant Operations and Safety Review Committee (POSRC) shall be responsible for review of facility operations to detect potential safety hazards.

Contrary to the above, the following examples represent failure of the POSRC to meet its responsibility of reviewing facility operations to detect potential safety hazards:

- (1) A through-wall leak on the ASME Class 2 piping of the #22 steam generator blowdown line was identified on March 8, 1989 and a Unit 2 startup was conducted on March 9, 1989 without a POSRC review of operating the facility in this manner.
- (2) Abnormal sulfate concentrations existed in the reactor coolant system at the time of a Unit 1 startup from Mode 5 without a POSRC review of operating the facility in this manner.
- (3) A June 3, 1987 complete failure of a bearing on the safety-related #22 containment spray pump was never reviewed by the POSRC.

In the aggregate, this is a Severity Level IV violation (Supplement I) applicable to DPR 53 and 69.

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.