

## Calvert Cliffs 1

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### Initiating Events

**Significance:** N/A Jan 01, 2000

Identified By: NRC

Item Type: FIN Finding

**Supplemental Inspection to review a Unit 1 white performance indicator for scrams with a loss of normal heat removal (LONHR).**

The NRC identified that the licensee had not reviewed previous LONHR events in sufficient detail during common cause development resulting in some corrective actions that were too general in nature. Because of the lack of specificity, it was not evident that performance problems were sufficiently understood to provide reasonable assurance that the corrective actions will minimize the future scrams with a LONHR. In addition, corrective actions to address plant equipment problems known to contribute to post-scram LONHR events appear to have been unnecessarily delayed. Consequently, the licensee's corrective actions have not yet been sufficiently developed to allow the NRC to complete the inspection objective of providing assurance that the corrective actions are sufficient to address the causes of scrams with a LONHR events and to prevent recurrence. The loss of normal heat removal following a scram is more risk significant because it increases the potential for a more adverse consequences. Notwithstanding, the use of backup safety systems to compensate for the LONHR function is not a violation of regulatory requirements.

Inspection Report# : [2000010\(pdf\)](#)

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### Mitigating Systems

**Significance:**  Jun 29, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to comply with the requirements of 10 CFR 55.53(f)(2) for reactivating licensees to support refueling outages as senior operators limited to fuel handling.**

The inspectors identified a Non-Cited Violation for failure to comply with the requirements of 10 CFR 55.53(f)(2) for reactivating operator licenses to support refueling outages as senior operators limited to fuel handling (LSRO). This finding was determined to be more than minor but of very low safety significance. It is more than minor because if left uncorrected it would become a more significant safety concern. Specifically, improper re-activation would result in improper training which could cause errors in fuel handling activities resulting in fuel damage and potential radiological releases. The SDP is entered because the performance deficiency is related to operator license conditions. The performance deficiency was determined to be of very low safety significance (green) because more than 20% of the LSRO license reactivations to support refueling operations did not meet the requirements of 10 CFR 55.53(f)(2). No refueling events have occurred due to this training deficiency.

Inspection Report# : [2002004\(pdf\)](#)

**Significance:**  Dec 29, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to identify and correct a condition adverse to quality on the 12 switchgear HVAC in accordance with 10CFR50, Appendix B, Criterion XVI**

A non-cited violation of 10CFR50, Appendix B, Criterion XVI, was identified because the licensee failed to identify and correct a condition adverse to quality on the 12 switchgear ventilation train. On October 8, 2001, the licensee failed to write an issue report to document that when the failure of both the 11 and 12 switchgear refrigeration compressors

necessitated aligning the system in the fresh air mode, the 12 switchgear ventilation train was unable to maintain switchgear room temperature. When the inspector identified during a review of control room logs that no issue report had been written, the licensee wrote the issue report on October 24, 2001. No corrective action was taken by the licensee to investigate or correct the degraded condition until it repeated itself on October 27, 2001, when they found that misadjusted damper actuators resulted in 50% fresh air rather than 100%. This issue has a credible impact on safety because the failure of the switchgear ventilation system to maintain switchgear room temperatures would result in the failure of several safety significant mitigating systems. The finding was considered to be of very low safety significance, because following the failure of the 12 switchgear ventilation unit in the fresh air mode, the 11 switchgear ventilation train was placed in service and returned switchgear room temperature to normal.

Inspection Report# : [2001012\(pdf\)](#)

**Significance:**  Dec 29, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to take timely and effective corrective action to mitigate excessive train unavailability for the switchgear HVAC in accordance with 10CFR50, Appendix B, Criterion XVI.**

A non-cited violation of 10CFR50, Appendix B, Criterion XVI was identified because the licensee failed to take timely and effective corrective action to mitigate excessive train unavailability for the switchgear ventilation system. The Unit 1 and Unit 2 switchgear ventilation systems have been classified maintenance rule (a)(1) since the fourth quarter of 1996, and the systems have exceeded maintenance rule performance criteria every quarter since 1996. Although the corrective action plan that has been in place since 1996 specified replacing the pneumatic controls, the fans, and the compressors, three fans and all four compressors have not yet been replaced. This issue has a credible impact on safety because the failure of the switchgear ventilation system to maintain switchgear room temperatures could result in the failure of safety related electrical busses in the switchgear room, as well as, the safety related equipment supplied by these busses. The finding was considered to be of very low safety significance, because the poor performance of this system has not resulted in switchgear room temperatures in excess of design limits.

Inspection Report# : [2001012\(pdf\)](#)

**Significance:**  Sep 30, 2001

Identified By: NRC

Item Type: FIN Finding

**UFSAR Chapter 14 Single Failure Assumptions**

The inspectors identified that the Updated Safety Analysis Report, Section 14.6, analysis for a loss of main feedwater did not assume a single failure of the auxiliary feedwater (AFW) system as specified in NUREG 0737, TMI Action Item II.E.1.1. This finding was of very low safety significance because the licensee's re-analysis demonstrated acceptable results by crediting operator action to increase AFW flow from the operating AFW pump.

Inspection Report# : [2001008\(pdf\)](#)

Inspection Report# : [2002002\(pdf\)](#)

**Significance:**  Sep 14, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate abnormal operating procedures for post-fire safe shutdown. (Section 1RO5.07)**

Contrary to 10 CFR 50, Appendix R, Section III.L.3, "Alternative and Dedicated Shutdown Capability: procedures AOP-9A and -9B (Unit 1) were inadequate in that they contained numerous deficiencies that presented challenges to the operators' ability to achieve and maintain safe shutdown.

Inspection Report# : [2001007\(pdf\)](#)

**Significance:**  Sep 14, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to account for steam generator inventory losses due to blow down flow. (Section 1RO5.07).**

Contrary to 10 CFR 50, Appendix B, Criteria III, "Design Control" design calculations and analysis for AOP-9 and loss of feedwater analysis were not adequate in that they failed to include inventory losses due to steam generator blow down flow.

Inspection Report# : [2001007\(pdf\)](#)



**Significance:** Jul 13, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to establish measures to prevent damage or deterioration of oil used for make-up to safety related equipment.**

The inspectors identified a Non-cited Violation for failure to establish measures to prevent damage or deterioration of make-up oil to safety related equipment. The inspectors observed visual debris in oil containers stored by operations personnel for make-up to safety related equipment. This is a violation of 10 CFR50 Appendix B, Criterion XIII, which requires, in part, measures be established to control the handling and storage of material to prevent damage or deterioration. This finding had a credible impact on safety, since visual debris in oil containers could have been transported into oil sumps and reservoirs associated with safety related equipment and degraded equipment performance. The issue affects the mitigating systems cornerstone since safety related mitigating equipment could be affected. However, since the debris was noted to be minor and localized at the bottom of the oil containers, and there is no indication of an actual loss of equipment as a result of contaminated make-up oil, this issue has been determined to have very low safety significance (Green) in accordance with the NRC SDP Phase 1 assessment.

Inspection Report# : [2001009\(pdf\)](#)



**Significance:** Jul 13, 2001

Identified By: NRC

Item Type: VIO Violation

**Violation of 10 CFR 50, Appendix B, Criterion V, regarding the application of sealant to the outboard turbine bearing to the 11 AFW pump, which contributed to it's May 16, 2001 failure.**

The inspectors identified a violation of 10 CFR 50, Appendix B, Criterion V, which requires, in part, that activities affecting quality shall be accomplished in accordance with documented instructions, procedures, or drawings. Contrary to this, on March 25, 2000, maintenance order instructions regarding the application of sealant to the 11 AFW pump turbine outboard bearing housing were not followed in that excessive sealant was applied, which most likely resulted in the bearing failure on May 16, 2001. This preliminary finding had a credible impact on safety, because the ability of a turbine-driven pump to perform its safety function was affected. This issue affects the mitigating cornerstone since AFW pumps supply feedwater to the steam generators to remove decay heat removal when main feedwater is unavailable. Using an SDP Phase 3 assessment, the issue has been characterized to have substantial safety significance (Yellow) based on the equipment function of removing decay heat and the length of time the excessive sealant was applied. (VIO 50-317/01-009-02; EA 01-206). Inspection report 50-317/01-009 presented the opportunity for the licensee to either request a regulatory conference to discuss their evaluation and any differences with the NRC evaluation, or to send the NRC their position in writing within 30 days. The licensee declined the opportunity and the final results of our SDP assessment and resulting violation were provided to the licensee in a letter dated September 19, 2001. While the licensee's investigation into the physical causes of the bearing failure was generally adequate, some weaknesses were observed. While these observations do not change the conclusions regarding the physical cause of the bearing failure, they are considered to be examples of weakness in the implementation of the corrective action program: (1) The quarantine of material found in the failed bearing and sump oil was less than effective, resulting in limited opportunity for confirmatory chemical analyses; (2) The potential for foreign material to enter the bearing from make-up oil added during daily operator rounds was not investigated until questioned during the inspection; (3) The licensee's conclusion that inadequate vendor technical manual direction led to the application of excessive sealant was not well supported by the results of the investigation; (4) Some missed opportunities to identify this problem prior to the bearing failure were identified.

Inspection Report# : [2001013\(pdf\)](#)

**Significance:**  Jul 13, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to include acceptance criteria for critical bearing tolerances in work instructions used to reassemble the 11 AFW pump turbine bearings in March 2000.**

The inspectors identified a Non-Cited Violation for failure to include appropriate quantitative and qualitative acceptance criteria in work instructions to ensure auxiliary feedwater pump turbine bearing reassembly was satisfactorily accomplished. Specifically, the maintenance order instructions for bearing reassembly after turbine overspeed tests did not include acceptance criteria for critical tolerances. This is a violation of 10 CFR 50 Appendix B, Criterion V, which requires, in part, that activities affecting quality shall be prescribed by documented instructions, and these instructions shall include appropriate quantitative and qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. The finding had a credible impact on safety, since maintaining turbine bearings within critical tolerances is required to ensure reliable operation of the turbine-driven AFW pumps. This issue affects the mitigating cornerstone since AFW pumps supply feedwater to the steam generators to remove decay heat when main feedwater is unavailable. However, since bearing inspections of the 11 AFW pump turbine and turbine vibration trending do not indicate the bearing failed as a result of out of an out of tolerance condition, and the performance of the turbine bearings for the 12, 21 and 22 AFW pump turbines is satisfactory, this issue has been determined to have very low safety significance in accordance with the NRC SDP Phase 1 assessment.

Inspection Report# : [2001009\(pdf\)](#)

**Significance:**  Jul 13, 2001

Identified By: NRC

Item Type: VIO Violation

**Violation of 10 CFR 50, Appendix B, Criterion V, regarding the application of sealant to the outboard turbine bearing to the 11 AFW pump, which contributed to it's May 16, 2001 failure.**

The inspectors identified a violation of 10 CFR 50, Appendix B, Criterion V, which requires, in part, that activities affecting quality shall be accomplished in accordance with documented instructions, procedures, or drawings. Contrary to this, on March 25, 2000, maintenance order instructions regarding the application of sealant to the 11 AFW pump turbine outboard bearing housing were not followed in that excessive sealant was applied, which most likely resulted in the bearing failure on May 16, 2001. This preliminary finding had a credible impact on safety, because the ability of a turbine-driven pump to perform its safety function was affected. This issue affects the mitigating cornerstone since AFW pumps supply feedwater to the steam generators to remove decay heat removal when main feedwater is unavailable. Using an SDP Phase 3 assessment, the issue has been characterized to have substantial safety significance (Yellow) based on the equipment function of removing decay heat and the length of time the excessive sealant was applied. (VIO 50-317/01-009-02; EA 01-206). Inspection report 50-317/01-009 presented the opportunity for the licensee to either request a regulatory conference to discuss their evaluation and any differences with the NRC evaluation, or to send the NRC their position in writing within 30 days. The licensee declined the opportunity and the final results of our SDP assessment and resulting violation were provided to the licensee in a letter dated September 19, 2001. While the licensee's investigation into the physical causes of the bearing failure was generally adequate, some weaknesses were observed. While these observations do not change the conclusions regarding the physical cause of the bearing failure, they are considered to be examples of weakness in the implementation of the corrective action program: (1) The quarantine of material found in the failed bearing and sump oil was less than effective, resulting in limited opportunity for confirmatory chemical analyses; (2) The potential for foreign material to enter the bearing from make-up oil added during daily operator rounds was not investigated until questioned during the inspection; (3) The licensee's conclusion that inadequate vendor technical manual direction led to the application of excessive sealant was not well supported by the results of the investigation; (4) Some missed opportunities to identify this problem prior to the bearing failure were identified.

Inspection Report# : [2001009\(pdf\)](#)

**Significance:**  May 25, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to properly implement procedures related to recognizing that degraded components presented an operability concern, and to document the basis for continued operability.**

A Non-Cited Violation of 10CFR50, Appendix B, Criterion V, was identified due to a failure to assess and document the basis for continued system operability in accordance with plant procedures associated with (1) degraded safety related dampers in the Unit 2 switchgear ventilation system that did not function as designed, and (2) indicated temperatures greater than the design limit in the Unit 2 reactor cavity annulus since 1995. The risk associated with failing to assess and document the basis for continued operation with this degraded equipment was determined to be of very low safety significance since, the switchgear ventilation system continued to perform its function to cool the vital switchgear rooms and the dampers were subsequently repaired, and a subsequent operability evaluation completed by the licensee during the inspection determined that the concrete could withstand increased localized temperatures.

Inspection Report# : [2001003\(pdf\)](#)

**Significance:**  May 25, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to identify an issue adverse to quality, and failure to take prompt corrective action for a significant condition adverse to quality.**

A Non-Cited Violation of 10CFR50, Appendix B, Criterion XVI, was identified due to (1) a failure to identify as a condition adverse to quality that the potential for air remaining after venting containment sump piping could result in degraded emergency core cooling system (ECCS) pump operation, and (2) a failure to correct in a timely manner a condition adverse to quality, identified via industry operating experience, regarding the potential for freezing in ECCS minimum recirculation flow piping. The risk associated with the potential for air remaining in the containment sump piping was determined to be of very low safety significance because an evaluation performed by the licensee during the inspection showed that ECCS pump operation would not be degraded. The risk associated with the potential for freezing in ECCS minimum recirculation flow piping line was determined to be of very low safety significance since there is no indication freezing has occurred in the recirculation line.

Inspection Report# : [2001003\(pdf\)](#)

**Significance:**  Feb 10, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Verify of Safety Injection Tank Boron Concentration**

Green. The inspectors identified a Non-cited Violation for failure to satisfy the technical specification surveillance requirement to verify boron concentration in each safety injection tank (SIT) every 31 days. This violation occurred due to an inadequate technical justification of an alternate method of verifying boron concentration. The safety significance of this finding was very low because subsequent SIT sampling determined that SIT boron concentrations remained within the technical specification required band. (Section 1R22)

Inspection Report# : [2000012\(pdf\)](#)

**Significance:**  Feb 10, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate design control associated with 4 KV breaker replacement.**

Green. The inspectors identified two examples of a Non-cited Violation for inadequate design control. The first example involved the failure to ensure operability of the containment spray pump supply breaker following a test failure that occurred two days after a modification to the breaker. The second example involved the failure to ensure

proper operability of five similar, but normally closed, replacement load center feeder breakers. The first example was found to be of very low significance because the loss of containment spray function does not affect core damage frequency; Manual Chapter 0609, Appendix H, did not list containment spray as a system having major impact on large early release frequency; and at the time of the inspection the licensee had already initiated corrective actions to address the failure and to prevent recurrence. The second example was also of very low significance because the licensee's physical inspection of the switchgear indicated acceptable alignment between the breakers and their housing and between the racking block plate and the breaker front covers. If tripped as a result of a seismic event, the breakers could be closed manually by the operators. (Section 1R12).

Inspection Report# : [2000012\(pdf\)](#)

**Significance:**  Dec 30, 2000

Identified By: Licensee

Item Type: NCV NonCited Violation

**The failure to perform a complete channel calibration of the PORV actuation circuitry per TS SR 3.4.12.6.**

The failure to perform a complete PORV actuation circuit channel calibration was determined to have more than minor significance because of the credible impact on safety in that the purpose of the periodic calibration is to verify PORV operability. This issue was determined to be of very low significance (Green) by the SDP because the Unit 1 RTDs were found to be within calibration and therefore operable. For Unit 2, previous calibration results demonstrate that the RTDs are generally not susceptible to drift. Further, schedule testing will verify Unit 2 RTDs are operable before the circuit is required to be in service and operable for LTOP protection. Reference LER 2000-003.00.

Inspection Report# : [2000011\(pdf\)](#)

**Significance:**  May 13, 2000

Identified By: NRC

Item Type: FIN Finding

**Degraded Protectowire fire detection system**

GREEN. The inspectors identified degradation of the Protectowire fire detection system installed to detect overheated electrical cabling in the Unit 1 containment cable trays. The deficiencies included: the detection wire not being in the optimum serpentine design configuration; and, the protective covering for the Protectowire detection wires being damaged. The deficiencies were noted in both trains of electrical cable trays in the vicinity of the containment penetrations. The Protectowire fire detection system was degraded, but operable (Section 1R05).

Inspection Report# : [2000004\(pdf\)](#)

**Significance:**  May 13, 2000

Identified By: Self Disclosing

Item Type: FIN Finding

**1A emergency diesel generator failed PMT, due to improper lube oil sump level.**

GREEN. During post-maintenance testing, the 1A emergency diesel generator (EDG) tripped on low oil sump level signal from the 1A2 engine (Section 1R19). An actual high level existed in the sump. Whipping of the oil by the crankshaft resulted in oil frothing in the sump and the sump level transmitter sensing lines. The oil frothing problem caused the sump level trip sensor to read lower than the actual level resulting in an EDG trip. The high oil sump level was caused by two problems: (1) incorrect guidance from the vendor (SACM) regarding the shutdown oil sump level band; and, (2) the 1A2 engine dipstick guidetube was aligned differently than the other engine's dipstick guidetube, resulting in actual sump level being higher than indicated. Since the low oil sump level is bypassed during a fast engine start, the 1A EDG would have started and ran given a safety injection actuation signal or an emergency bus undervoltage signal. However, if the engine was manually started to respond to a plant event, the low oil sump level trip would not have been bypassed and the EDG would have been expected to trip in the same manner experienced during the post-maintenance testing.

Inspection Report# : [2000004\(pdf\)](#)

**Significance:** N/A May 13, 2000

Identified By: NRC

Item Type: FIN Finding

**Protectowire degradation - cross-cutting issue, PI&R**

NO COLOR. The degraded condition of the Protectowire fire protection feature (Section 1R05) was identified by the inspectors and was apparently caused when the fire detection system was not restored after being removed for work in the cable trays. BGE personnel could not specifically identify how long the condition had existed. Although testing is periodically conducted to verify the alarm function of the Protectowire fire detection system, no procedure or instruction exists to periodically verify that the detection wire remains installed in its design configuration.

Inspection Report# : [2000004\(pdf\)](#)

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## Barrier Integrity

**Significance:**  Jun 29, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to comply with the requirements of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," regarding the Unit 1 and 2 main steam line break accident analyses.**

The inspectors identified a Non-Cited Violation for inadequate design control in associated with the Units 1 and 2 main steam line break (MSLB) accident analyses. The analyses credited the closure of the main feedwater isolation valves (MFIVs) to limit containment peak pressure even though in certain single failure scenarios, the valves may not fully close due to high differential pressure. This violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," Based on the example provided in NRC Manual Chapter 0612, Appendix E, Example 3.i, the above MFIV finding is more than minor because an error identified in an accident analysis assumption requires the accident analysis to be re-performed to assure accident analysis requirements are met. The MFIV finding was determined to be of very low safety significance (green) based on the fact that when the licensee revises their MSLB accident analyses to credit closure of the main feedwater regulating valves, it is likely to result in a net reduction in containment peak pressure.

Inspection Report# : [2002004\(pdf\)](#)

**Significance:**  Mar 31, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Violation of TS 3.3.7 for containment radiation sensor bypassed for more than four hours during core alterations**

GREEN. Licensee Event Report (LER) 05000317/2000-04-00 identified that one of four containment radiation sensors was in bypass during Unit 1 core alterations, a condition prohibited by Technical Specification (TS) 3.3.7 CCNPPI immediately halted core alterations and restored the bypassed sensor to normal. CCNPPI determined that human error was the cause of the event. Since the finding did not represent an actual open pathway in the physical integrity of reactor containment or an actual reduction of the atmospheric pressure control function of the reactor containment, this item was determined to be of very low safety significance. Having a containment radiation sensor bypassed for more than four hours during core alterations was considered a Non-Cited violation. (Section 1R14).

Inspection Report# : [2000006\(pdf\)](#)

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## Emergency Preparedness

**Significance:**  Jul 19, 2002

Identified By: NRC

Item Type: AV Apparent Violation

**ANS was not capable of activating for 84 days in a timely manner.**

The inspector identified an apparent violation of 10 CFR 50.54(q), 10 CFR 50.47(b)(5) and Appendix E.IV.D.3. The Calvert County offsite ANS (49 sirens) was not capable of being activated in a timely manner for 84 days due to the removal of a computer icon used for activating the sirens at the Calvert County, Maryland 911 Center. The means to alert and notify the public in a timely manner is a Risk Significant Planning Standard (RSP) and according to the Emergency Preparedness (EP) Significant Determination Process (SDP), (Manual Chapter 0609, EP Risk Determination Flow Chart, Sheet 1, Third Path, Section 4) failure to meet this RSPS is considered of moderate to high safety significance (Yellow). However, using Manual Chapter 0609, Appendix B, Section 1, "Failure to Meet a Risk Significant Planning Standard," and the EP SDP it recognizes that a finding "placed in context" through the SDP can potentially result in a color (e.g. Green, White, Yellow, Red) that exceeds the actual impact on public health and safety. The NRC concluded that the siren activation problem did not have a substantial impact on the EP Cornerstone Objective, and therefore, the finding does not rise to the level of substantial safety significance and is more appropriately characterized as low to moderate safety significance (White). In making this determination, the NRC considered that: (1) the system was capable of sounding and notifying the public within 30 minutes if the system was needed to be activated during the 84-day period (this was based on the time the County identified and fixed the icon problem); (2) prior to the activation of the sirens, 55 emergency vehicles would be placed in the field to begin automatic route alerting simultaneously with initial siren activation (this activity supplements coverage provided by siren activation); and (3) there were no significant equipment problems found to prevent the actual sounding of the sirens as demonstrated on November 15, 2001, during a retest in which 100% of the sirens sounded. Accordingly, the NRC considers the significance of the problem to be the length of time the problem was undetected which is considered a low to moderate safety significance (White). Accordingly, the NRC has determined that the capability of meeting the function of alerting the public was met, but not in a timely manner. The NRC considers the true significance of the problem to be in the length of time the problem was undetected. Therefore, the finding is considered to be of low to moderate safety significance (White). (Section 1EP2)

Inspection Report# : [2002010\(pdf\)](#)



**Significance:** Aug 12, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Non-cited violation of offsite siren notification system surveillance testing requirements.**

Green. The NRC identified that a violation of NRC requirements occurred in the area of offsite siren testing in that the quarterly offsite siren growl tests for identifying mechanical problems were inadequately conducted. This violation is being treated as a non-cited violation and was entered into the licensee's corrective action system (Section 1EP2).

Inspection Report# : [2000007\(pdf\)](#)

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## Occupational Radiation Safety



**Significance:** Dec 29, 2001

Identified By: NRC

Item Type: FIN Finding

**Failure to implement effective corrective actions for issues involving inadequate radiological evaluations to support work activities.**

The licensee has not established effective problem resolution for recurring issues involving failure to conduct adequate radiological surveys to support planning and conduct of radiological work activities. On July 13, 2001, the licensee failed to conduct adequate pre-job and ongoing radiological surveys to detect elevated levels of radioactive contamination within the No. 22 chemical and volume control system ion exchanger pit for work therein. This contributed to elevated airborne radioactivity and limited intakes of airborne radioactive material by workers during the work activities. The licensee's root cause analysis and NRC review identified that similar inadequate radiological surveys had been identified on previous events and that some of these problems were repeated during the event despite



the implementation of corrective actions. The failure to implement effective corrective actions is a cross-cutting issue determined to be more than minor. The issue was evaluated under the Occupational Radiation Safety significance determination process and determined to be a finding of very low safety significance. The issue was not an as-low-as-reasonably-achievable finding, did not involve an overexposure or substantial potential, and did not affect the ability to assess dose. The issue was included in the licensee's corrective action process.

Inspection Report# : [2001012\(pdf\)](#)

G

**Significance:** Dec 29, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**Failure to implement 10 CFR71.87 regarding adherence to cask loading procedures.**

10 CFR71.87 requires the licensee to load shipments of radioactive material in accordance with written procedures. On September 5, 2001, the licensee did not adhere to procedure RPS 2-231, for the loading of a Type B shipment of radioactive material. Specifically, the licensee did not ensure hardware compatibility ratings for hoisting operations and used a crane hook, rated to 6,000 pounds, to raise and transfer in air an approximately 7,000 pound container of waste containing approximately 91 curies of mixed radionuclides. The licensee identified the issue on November 6, 2001, and subsequently determined the hook had been load tested to 9,000 pounds. The licensee took various corrective and preventative actions and placed the issue into its corrective action process.

Inspection Report# : [2001012\(pdf\)](#)

G

**Significance:** Aug 11, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**Licensee did not implement Technical Specification 5.4 and RG 1.33 during planning and repair of gasket for 22 CVCS IX.**

On July 13, 2001, the licensee did not implement the requirements of Technical Specification 5.4 and RG 1.22, Rev. 2, February 1978 (Appendix A, Section 7e) during planning and repair of gasket on the No. 22 CVCS IS. As a result, the leaking gasket caused elevated contamination levels that were not identified and evaluated prior to the conduct of the work activity. The issues involving this event were addressed by various corrective action IRs (Nos. 072-016 and 045-460, 461, 462, 463, 464, 465, 466, 467, 468, 469 and 470). This issue is being treated as a Non-Cited Violation

Inspection Report# : [2001006\(pdf\)](#)

G

**Significance:** Aug 11, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**Licensee did not follow maintenance work order.**

A Non-Cited Violation of Technical Specification 5.4 was identified for failure to implement a maintenance work order for repair of the 22 Chemical Volume and Control System (CVCS) ion exchanger (IX) gasket on July 23, 2001. The licensee did not install and use the high efficiency particulate air (HEPA) filtering system, that was specified in the work order, and which was necessary to control the spread of radioactive contamination and reduce the potential airborne radioactivity concentrations during the work. This finding was greater than minor because the failure to use the HEPA filtering system that was specified for this work contributed to the unnecessary personnel exposure to airborne radioactivity. However, this issue did not constitute an As Low As Reasonably Achievable (ALARA) finding, did not result in a substantial potential for an overexposure, and did not affect the licensee's ability to assess dose to workers. Accordingly, this finding is considered as having very low safety significance. The Non-Cited Violation was entered into the licensee's corrective action program under Issue Report No. IR3-045-473. (Section 2OS1)

Inspection Report# : [2001006\(pdf\)](#)

G

**Significance:** Jun 30, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**Failure to conduct an adequate radiological surveys of the Unit 2 reactor shroud. (Section 40A7)**

On May 3, 2001, the licensee did not conduct adequate radiological surveys, as required by 10 CFR 20.1501, to detect the presence of loose radioactive contamination, contained within the Unit 2 reactor shroud, prior to starting control element drive motor (CEDM) fans. Following the start of the fans, quantities of loose radioactive contamination were blown into the containment atmosphere from within the shroud area resulting in generation of elevated airborne radioactivity within containment, evacuation of workers from containment, and limited intakes of radioactive material by workers. No personnel overexposure occurred, no substantial potential for such an overexposure was apparent, and the licensee's ability to assess dose was not compromised. This matter was incorporated into the licensee's corrective action system on May 3, 2001, (Issue Report No. IR3-076-089).

Inspection Report# : [2001005\(pdf\)](#)

**Significance:**  Apr 08, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to implement procedural requirements for transfer of contaminated waste bags.**

The inspector identified a Non-Cited violation for failure to implement procedures during transfer of externally contaminated bags of waste from the Unit 1 reactor cavity to the 45 foot elevation of the spent fuel building. Additionally, routine surveys were not properly documented. This finding was of very low safety significance because the evolution did not result in an over exposure, did not create a substantial potential for such an exposure, and did not compromise the ability of the licensee to assess dose to its workers.

Inspection Report# : [2000009\(pdf\)](#)

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## Public Radiation Safety

**Significance:**  Sep 28, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to fill & limit contents of shipment radio active material to waste processing facility 7/11/02 in accord. with DOT 49 CFR 173.24(b)(2), specified by 10 CFR 71.5, Transp. of Lic. Material".**

The inspector conducted an in-office review of the circumstances involving a shipment containing radioactive materials made on July 11, 2002, (Shipment No. 02-065) from Constellation Generation's Calvert Cliffs Nuclear Power Plant to a waste processing vendor facility in Oak Ridge, Tennessee. The review included examination of the Constellation Generation's performance relative to the preparation of the shipment. Based on an in-office review, the inspector identified a finding having very low safety significance that resulted in a non-cited violation of 10 CFR 71.5, "Transportation of Licensed Material", which requires compliance with the applicable requirements of Department of Transportation regulations 49 CFR, Parts 170 through 189. Specifically, on July 11, 2002, Constellation Generation (Calvert Cliffs Nuclear Power Station) shipped a container of radioactive materials that was not prepared in accordance with 49 CFR 173.24, "General requirements for and packages", sufficient to preclude a substantial reduction in the effectiveness of the package, under conditions normally incident to transportation. Consequently, when received at the intended destination on July 12, 2002, a small hole (about 1 onch by 2 inches) was found in the side of the container, with a small portion of a metal object protruding through the hole. On July 11, 2002, Constellation Generation shipped a Sealand box trailer (package) containing radioactive waste materials from its Calvert Cliffs facility to a vendor facility in Oak Ridge Tennessee for processing. The shipment (02-065) consisted primarily of structurla steel with some bagged waste filters and was shipped as exclusive use, low specific activity (LSA). The total weight of the package, including its contents, was 31,650 pounds, The maxium design weight for the package and contents is 44,800 pounds. The total activity was 5.9 millicuries of solid/metal mixed oxides. The material was to be braced during filling. However, the package was shipped from Calvert Cliffs Nuclear Power Station without bracing of the contents. A radiation and contamination survey and inspection of the exterior of the package was performed by Constellation

Generation prior to shipping. On arrival at the vendor's processing facility on July 12, 2002, the shipment was inspected and a receipt radiation and contamination survey was performed by the vendor. The inspection identified an approximately one inch by two inch breach (hole) in the 20 foot Sealand container near the top of the right upper-side of the container. A portion of a steel object was protruding about one-half inch through the side of the package. The receipt radiation and contamination surveys did not identify any elevated radiation levels or contamination on the exposed portion of the protruding metal or on the exterior or interior of the package. There was no evidence that any of the contents of the package were lost. The vendor informed Constellation Generation of this condition on July 12, 2002. Constellation Generation documented this issue in its corrective action program as Issue Report IR3-065-680. They also initiated immediate actions to preclude recurrence, including stopping all radioactive material shipments from the station until corrective actions could be put into place. Since this violation of 10 CFR 71.5 is of very low safety significance and Constellation Generation entered the finding into its corrective action program, this violation is being treated as a Non-Cited Violation consistent with Section VI.A of the NRC Enforcement Policy issued May 1, 2000.

Inspection Report# : [2002005\(pdf\)](#)



**Significance:** Jun 29, 2002

Identified By: NRC

Item Type: VIO Violation

**Failure to prepare a shipment of radioactive material so as not to exceed the transportation radiation level limits of 49 CFR 173.441(a).**

From an in-office review, the inspector identified an apparent finding of low to moderate safety significance. On May 23, 2002, the licensee failed to prepare a shipment of radioactive material to a waste processing facility in a manner such that, under conditions normally incident to transportation, the radiation level at any point on the external surface of the package would not exceed 200 millirem per hour, as specified by the Department of Transportation regulation 49 CFR 173.441(a). Upon arrival at the processing facility on May 24, 2002, the radiation dose rates, measured on portions of the external surface of the package were as high as 300 millirem per hour, which is in excess of the limits specified by the regulatory requirement. The failure to properly prepare the shipment in a manner to assure conformance with the requirements of 49 CFR 173.441(a) was determined to have low to moderate safety significance, using the Public Radiation Safety Significance Determination Process. The finding involved the transportation of radioactive material in which an external radiation limit was exceeded, but was not greater than 5 times the regulatory limit.

Inspection Report# : [2002004\(pdf\)](#)

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## Physical Protection

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## Miscellaneous

**Significance:** N/A May 25, 2001

Identified By: NRC

Item Type: FIN Finding

**Performance in the area of Problem Identification and Resolution is generally adequate.**

The inspectors determined that the licensee's performance in the area of problem identification and resolution at the Calvert Cliffs site was generally adequate. The Calvert Cliff's staff identified risk significant problems at an appropriate threshold, and the problems were classified at the appropriate significance level. Root cause evaluations were consistent with the significance of the problem, and corrective actions were associated with the cause of the problem. The engineering and maintenance backlogs, as well as the corrective action backlog, appeared to be adequately managed. The results of the licensee's audits and self-assessments were appropriately considered for entry into the corrective action program. Notwithstanding, the inspectors identified examples of a failure to identify and correct problems associated with emergency core cooling piping. Additionally, the inspectors identified examples of a failure

to assess and document the basis for continued operability in accordance with plant procedures; these were associated with degraded switchgear ventilation dampers and increased temperatures in the reactor cavity annulus.

Inspection Report# : [2001003\(pdf\)](#)

**Significance:** N/A May 26, 2000

Identified By: NRC

Item Type: FIN Finding

**BG&E personnel effectively identified, entered, prioritized, and evaluated problems at Calvert Cliffs**

In general, BG&E personnel effectively identified, entered, prioritized, and evaluated problems at the Calvert Cliffs station in accordance with their established corrective action program guidance. The team identified several minor deficiencies associated with problem identification and evaluation, although the total number of these issues were low. The inspection team also determined that BG&E's implementation of individual corrective actions was appropriate. Nuclear performance assessment department audits were thorough and provided good independent oversight of plant activities.

Inspection Report# : [2000005\(pdf\)](#)

Last modified : December 02, 2002