

BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

April 27, 1979

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

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

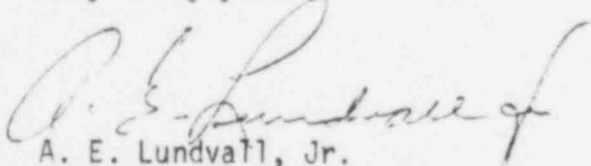
Attention: George H. Smith, Chief
Fuel Facility and Materials
Safety Branch

Gentlemen:

This refers to your Inspection Report 50-317/79-04; 50-318/79-04, which transmitted items of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to the items noted in your letter of April 5, 1979.

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

Very truly yours,



A. E. Lundvall, Jr.
Vice President - Supply

AEL/RED/dds

Enclosure

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ENCLOSURE (1)

REPLY TO APPENDIX A OF I&E LETTER OF APRIL 5, 1979

ITEM A

It is our understanding that the required operating procedures are primarily administrative controls designed to designate areas of responsibility to ensure that the requirements of the Environmental Technical Specifications are met. The operating procedures are reviewed by the Environmental Engineering Group and are approved by the Chief Environmental Engineer. Current copies of the operating procedures are maintained in the files of the Environmental Engineering Group.

The laboratory methods for sample analyses are established by the laboratories performing the analyses, whether they are "in house" or "outside". Methods used must, of course, satisfy the requirements of both the Environmental Technical Specifications and the operating procedures. The Environmental Engineering Group reviews the analytical results to ensure that these requirements are being fulfilled.

Current copies of all laboratory methods are maintained in the files of the Environmental Engineering Group.


ITEM B

During the fourth quarter of 1978 four samples of fish were collected. Bones from these samples were separately analyzed for SR-89 and SR-90 by our contractor, namely Radiation Management Corporation (RMC), using a laboratory method in conformity with the recommendations of Reg. Guide 4.6, "Measurement of Radionuclides in the Environment Strontium-89 and Strontium-90 Analyses".

The results of these analyses showed positive concentration values for Sr-90 in three samples. It is our understanding that the LLD requirements do not apply to positive values.

One Sr-90 and four Sr-89 results were "less than" values and did not meet the LLD requirement. The RMC laboratory method is currently under review in an attempt to meet the required analytical sensitivities for SR-89 and Sr-90 in fish bone.

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ITEM B (Continued)

The latest NRC guidance on Standard Radiological Effluent Technical Specifications (STS) for PWR's eliminates the radiostrontium analyses in fish bone. Using this guidance we prepared a preliminary draft of STS for Calvert Cliffs Units 1 and 2 which was submitted March 15, 1979 to the NRC.

ITEM C

The off-site farms at locations 15 and 16 are owned and operated by independent farmers. BG&E can exercise no control over what these farmers plant, if they plant anything at all, or when they harvest at these locations. Of course, we maintain communications with these farmers as frequently as is reasonable to obtain food crop samples when available.

BG&E recognizes the need for an assured supply of food crop samples. Accordingly, we have reviewed the food crop sampling location part of the monitoring program. A preliminary draft of STS for Calvert Cliffs with the proposed changes in the sampling locations was submitted March 15, 1979 to the NRC.