



CHARLES CENTER • P.O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

June 12, 1981

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

ATTENTION: B. H. Grier, Director
Inspection & Enforcement

Gentlemen:

This refers to your Inspection Report 50-317/81-06; 50-317/81-06, which transmitted several 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 May 19, 1981. The actions being taken to improve the effectiveness of our management control systems and to insure that the identified items of noncompliance will not recur are addressed as appropriate in conjunction with the responses to each item.

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

Very truly yours,

Vice President-Supply

AEL/RED/gla

Enclosure (1)

June 12, 1981

STATE OF MARYLAND:
:
CITY OF BALTIMORE: TO WIT:

Arthur E. Lundvall, Jr., being duly sworn states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements are true and correct to the best of his knowledge, information, and belief; and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal

Arthur H. Grier
Notary Public

My Commission Expires:

July 1, 1982

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Director, Office of Inspection & Enforcement
R. E. Architzel, NRC Resident Inspector

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/81-06; 50-318/81-06

ITEM 1

At this time the only approved counting geometry for a waste gas decay tank is the 7.5 cc gas vial, although others are being considered for future development. All technicians have been informed of this item of noncompliance and reminded of the requirements of the existing procedure. Additional management controls to prevent recurrence have been instituted through the Quality Assurance Department (QAD). The next QAD surveillance/audit of the chemistry program will be modified to include the sampling and analysis of the waste gas decay tank. Full compliance will be achieved in this area by September 1, 1981.

ITEM 2

Procedure revisions are currently in the final review process for incorporation of a liquid scintillation quench curve and clarification for use of self-absorption factors. The chemistry technicians will be trained in the requirements of these procedure revisions when final approval has been completed. Full compliance with these corrective measures will be achieved by July 1, 1981.

ITEM 3

Procedure RCP 2-301.4, "Set Up and Calibration of the Gamma Ray Spectrometer with Ge(Li) Detector", is currently under revision. The revision will require NBS traceable radiochemical standards for calibration of the gamma identification systems. Additional management controls to prevent recurrence have been instituted through the Quality Assurance Department. The next QAD surveillance/audit of the chemistry program will be modified to include adherence to this revised procedure. Full compliance with this commitment will be achieved by September 1, 1981.

ITEM 4

The Twelve Month Release Rate Calculation Sheet, required to be performed by the Supervisor-Plant Chemistry, has been updated and maintained since the NRC inspection. Management controls to prevent recurrence are being instituted in the form of a procedural change. Procedure RCP 1-103, "RadChem Quality Control Procedure" is being revised to include a monthly check, including both the completeness and accuracy, of these records by the General Supervisor-Chemistry, or his alternate. Full compliance with this procedure revision commitment will be achieved by July 1, 1981.