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March 5, 1990

To: Ronald R. Bellamy, Chief
Facilities Radiological Safety and Safeguards Branch
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

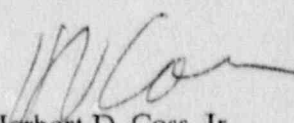
Subject: Combined Inspection Nos. 50-317/90-03 and 50-318/90-03
Response to Violation

Dear Sir:

Pursuant to 10 CFR 2.201, The Baltimore Gas and Electric Company is responding to the notice of a Severity Level IV violation which resulted from the combined inspection of the Calvert Cliffs Nuclear Power Plant, Units 1 and 2, conducted on January 8-12, 1990.

Baltimore Gas and Electric Company's response is submitted as Attachment I to this letter.

Should you have any questions, require additional information, or clarification of the response, my staff and I are at your disposal.


Herbert D. Coss, Jr.
Vice President
General Services Division

cc: U.S. NRC Document Control Room
Mr. Robert C. Dernoga, Manager, Facilities Management Dept.
Mr. Vaughn F. Bradley, Director, Security Services
Mr. George B. Brosan, General Supervisor, Loss Prevention
Mr. Larry P. Gibbs, General Supervisor, Calvert Cliffs Security Operations
Attachment

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PDR ADOCK 05000317
Q PIC

Attachment I
Baltimore Gas and Electric Company
Response to Violation
Inspection Nos. 50-317/90-03 and 50-318/90-03

Violation:

Members of the Nuclear Security Force were not being tested for field-of-vision and glaucoma as required by the Baltimore Gas and Electric Company's Training and Qualification Plan.

I. Root Cause:

The Baltimore Gas and Electric Company's Medical Services Section, in an effort to standardize company medical examinations, inadvertently dropped the testing for field-of-vision and glaucoma.

Security Services, and specifically the Security Training and Education Unit who is responsible for the administration of the Training and Qualification Plan, was not aware of Medical's decision to eliminate the testing requirements and, since the certification form was not changed, assumed that all testing criteria continued to be met.

II. Corrective Actions:

- o Medical Services, as an interim measure, tested all members of the Nuclear Security Force for glaucoma and field-of-vision requirements as required by the Training and Qualification Plan during the period of January 29 to February 22, 1990.
- o As a permanent corrective measure, the Security Planning and Programs Unit, in conjunction with Medical Services, developed a comprehensive checklist to be used during initial and requalification medical examinations of our Nuclear Security Personnel. The checklist identifies all requirements of 10 CFR 73 Appendix B and Training and Qualification Plan medical qualification criteria to include the requirements for glaucoma and field-of-vision testing. The checklist requires the examiner to place his/her initials on each item as it is completed and stipulates the examination is to be reviewed and certified by a BG&E licensed physician. The checklist was implemented on January 29, 1990.

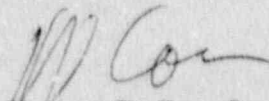
III. Preventive Actions

- o The importance of compliance with NRC regulations and BG&E Security Licensing Documents was reaffirmed in discussions with the Director of the Medical Services Section. Medical has agreed that any future changes in procedures, affecting or potentially affecting regulatory compliance, will be submitted to Security Services, Security Planning and Programs Unit for review prior to implementation.
- o Medical requirements will be included in Security Services on-going self-assessment audits.
- o In accordance with the policies of the Quality Assurance and Staff Services Department, Security Services will request Quality Assurance Audits include

peripheral requirements such as Medical and Employee Services records and procedures during annual preaudit meetings.

IV. Compliance

As of February 22, 1990, the Baltimore Gas and Electric Company is now fully in compliance with NRC Regulations and the Training and Qualification Plan and the violation has been corrected. The actions outlined above, both completed and planned, are sufficient to preclude this type of violation from reoccurring in the future.



Herbert D. Coss, Jr.
Vice President
General Services Division

Baltimore Gas and Electric Company

Interim Medical Records Review and Examination
for
Nuclear Security Personnel

To: Security Training and Education Unit

From: Medical Services

This is to certify that the following individual has been tested to ensure he/she meets the requirements as specified by 10 CFR 73, Appendix B, {I, B, 1, b, (1), (a)} for glaucoma and field of vision. This examination is in response to an inspection by the Nuclear Regulatory Commission of January 8-13, 1990.

In addition, the existing medical records of this individual have been reviewed to verify that all other requirements of 10 CFR 73, Appendix B for medical qualification were tested/evaluated during the most recent medical examination.

Based on this examination and review of records, it has been determined that:

Name: _____ Job Title: _____

SS#: _____ Employee #: _____

☐ is qualified

☐ is not qualified

☐ qualification is deferred

Note: In the event this examination/review of records has determined that qualification must be deferred, a complete follow-up medical examination will be scheduled and the individual will be limited to the following duties in the interim:

A hard copy of the specifics of the physical examination performed are on file in Medical.

Medical must be notified of any serious illness, injury, disease or operation which could interfere with the effective performance of assigned security job duties and shall, prior to resumption of such duties, be provided with medical evidence of recovery and ability to perform such security job duties.

_____, MD
Licensed Medical Doctor

Date

License Number

Baltimore Gas and Electric Company
Medical Certification Form
for
Nuclear Security Personnel

☐ Initial Certification

☐ Recertification

To: Security Training and Education Unit

From: Medical Services

Pursuant to NRC Rules and Regulations (10 CFR 73, Appendix B) and the Calvert Cliffs Security Training and Qualification Plan requirements, this is to certify that:

Name: _____ Job Title: _____

SS#: _____ Employee #: _____

has been examined to determine if he/she meets the following qualifications:

(EXAMINER/REVIEWER: Initial each item to indicate compliance. A checkmark in the boxed items indicates a condition, such as corrective lenses, is necessary to meet the qualification requirements.)

- _____ 1. Has no physical weaknesses or abnormalities that would adversely affect performance of Security job duties.
- _____ 2. Meets vision requirements, to include glaucoma, field of vision, and color vision parameters.
☐ Meets vision standards when corrective lenses are worn.
- _____ 3. Has no uncorrectable loss of vision in either eye. [As defined by 10 CFR 73, App. B (I, B, 1, b, (1) (a))]
- _____ 4. Meets hearing requirements.
☐ Meets hearing requirements when hearing aid is worn.
- _____ 5. Has no history or diagnosis of uncontrolled epilepsy or diabetes.
☐ is a controlled diabetic and insulin/medication is required.
☐ is a controlled epileptic and medication is required.
- _____ 6. Has no established medical history or diagnosis of habitual alcohol or drug addiction.
- _____ 7. Has no physical incapacitation caused by illness, injury, disease or operation which would affect performance of job duties.

Based on the preceding medical examination, this individual is: *(Check only one.)*

☐ Qualified

☐ Not Qualified

☐ Deferred Qualification *

* Information concerning deferred qualification and any accompanying restrictions, if any, is specified on the second page of this report.

**Baltimore Gas and Electric Company
Medical Certification Form
for
Nuclear Security Personnel**

(Complete the following section only if applicable.)

Qualification for certain security job duties is **temporarily deferred** due to an existing injury, illness or medical condition. Job restrictions are listed below and the individual has been notified of the requirements that must be met before qualification will be acceptable.

Job activity restrictions: _____

Follow-up examination: _____

Date

Time

A hard copy of the specifics of the physical examination performed are on file in Medical.

Medical must be notified of any serious illness, injury, disease or operation which could interfere with the effective performance of assigned security job duties and shall, prior to resumption of such duties, be provided with medical evidence of recovery and ability to perform such security job duties.

_____, M.D.
Licensed Medical Doctor

License Number

Date

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