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March 29, 1993

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Response to Spent Fuel Pool Crane Testing Notice of Violation

REFERENCE: (a) Letter from Mr. C. J. Cowgill (NRC) to Mr. R. E. Denton (BG&E),
dated June 5, 1992, NRC Region I Resident Inspection of Calvert
Cliffs Units 1 and 2, Combined Inspection Report Nos. 50-317/93-02
and 50-318/93-02

Gentlemen:

In response to Reference (a), Attachments (1) and (2) are provided.

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

Very truly yours,

for
R. E. Denton
Vice President-Nuclear Energy

RED/DWM/dwm/bjd

Attachments

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cc: D. A. Brune, Esquire
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ATTACHMENT (1)

NOTICE OF VIOLATION 50-317(318)/93-02/01

Notice of Violation 50-317 and 50-318/93-02/01 states that contrary to Technical Specification 6.8.1.g, during spent fuel pool crane testing between January 4-19, 1993, five personnel exceeded 72 hours of work in a seven day period without prior written authorization.

I. DESCRIPTION AND CAUSE OF EVENT

In December of 1992, a new single failure proof spent fuel pool (SFP) area crane trolley was installed above the SFP, upgrading a preexisting crane. The crane upgrade was installed to enable transfer of a spent fuel cask from the SFP to a vehicle which transports the spent fuel cask to the Independent Spent Fuel Storage Installation. The SFP crane was tested by contractors directed by BG&E personnel.

During the testing of the SFP crane, the test coordinator, test engineer, two vendor representatives and one BG&E electrician worked more than 72 hours in a seven day period without pre-approval in writing by the Plant General Manager, appropriate Superintendent or General Supervisor. This violated the provisions of Calvert Cliffs Instruction (CCI)-159, "Use of Overtime."

The cause of this event is that the personnel involved were not familiar with the need to have written approval prior to exceeding the overtime limits. They did not receive adequate instruction on the applicability of this Calvert Cliffs procedure to their work.

II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

We have counseled the appropriate personnel involved in this matter and have provided instruction to personnel involved in similar projects on the applicability of procedures regarding use of overtime. The specific problems resulting in this violation were reviewed with all project personnel, emphasizing the errors made.

III. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The overtime policy will be added to the Calvert Cliffs Initial Supervisor Training Program, including discussion of the industry experience which led to these controls. New Project Management supervisors will receive this training.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when the problem was discovered and the affected personnel were informed of overtime policies regarding written authorization.

ATTACHMENT (2)

NOTICE OF VIOLATION 50-317(318)/93-02/01

Notice of Violation 50-317 and 50-318/93-02/02 states that contrary to Technical Specification 6.8.1.a, there were four instances of procedural noncompliance associated with testing of the spent fuel pool area crane between January 4 and January 19, 1993.

I. DESCRIPTION AND CAUSE OF EVENTS

The recently installed spent fuel pool (SFP) area crane has two hooks, a small auxiliary hook, and a large main hook. Three Engineering Test Procedures (ETPs) were written to perform the testing. Engineering Test Procedure 92-129 performed a functional test of the overall crane. Engineering Test Procedure 92-130 tested the interlocks and protective circuitry for the auxiliary hook. Engineering Test Procedure 92-131 tested the interlocks and protective circuitry for the main hook.

- A. An individual who signed three changes to ETPs as a Procedure Screener was not fully certified to screen changes to ETPs. The individual had been trained and his qualification card was complete, but the card had not been signed by a General Supervisor as required by PR-1-102.
- B. Performance of an ETP was not immediately halted when it was discovered that the ETP could not be performed as written. On January 19, 1993, personnel performing ETP 92-129 found that physical obstructions in the building and the size of the test load platform did not allow the loaded crane trolley to be moved to the full travel limits specified in the procedure. A Quality Verification (QV) technician recommended that project personnel lower the load putting the equipment in a safe condition. While the QV technician was calling his supervisor, the Project Manager had the crane moved to determine what other physical limitations would restrict the crane's movements. He thought this was within the scope of the existing procedure since the procedure specified moving the load to the full travel limits and believed it to be conservative as the load would not need to be raised a second time following revision of the ETP to reflect the physical limitations. The move was completed and the load was placed on the floor before the QV technician finished speaking to his supervisor.
- C. A procedure step was not performed in accordance with the procedure and was incorrectly signed off as being done as written. On January 17, 1993, the vendor technical representative found that a step in ETP 92-131 for the main hook could not be performed as written. Calvert Cliffs Instruction (CCI)-132, "Requirements for Implementation, Use, and Record Keeping of ETPs," requires that if an ETP can not be performed as written, the test will be stopped and the affected equipment placed in a safe condition. The ETP shall then be changed in accordance with Calvert Cliffs Administrative Procedure PR-1-101, "Preparation and Control of Calvert Cliffs Technical Procedures." Although the step for setting the load cell was changed in ETP 92-130 for the auxiliary hook, the identical step was not revised in ETP 92-131 for the main hook. The technical representative did not perform the step in accordance with ETP 92-131 and this step in the test was incorrectly signed off as being done as written.
- D. Attendance at the pre-evolution briefings did not include all personnel involved in the ETPs, as required by CCI-132 and CCI-140. Engineering Test Procedures 92-129, 92-130 and 92-131 were begun January 4, 1993, and concluded

ATTACHMENT (2)

NOTICE OF VIOLATION 50-317(318)/93-02/01

January 19, 1993. Calvert Cliffs Instruction (CCI)-132 requires that pre-evolution briefs be conducted as described in CCI-132 and CCI-140, "Conduct of Operations." CCI-140 also states that any persons not attending the brief that need to become involved in the evolution shall be properly briefed prior to beginning any involvement in the evolution. Though briefings were held, attendees consisted of the Test Coordinator and representatives from Construction Inspection and contractor supervision. The Test Coordinator briefed Operations personnel in the Control Room prior to performing the ETPs. Crane operators and crane vendor technical representatives participated in separate briefings on the deck. Written records of attendance were incomplete and not all personnel involved in preparing for the lifts and their conduct were included.

The cause of these events was that personnel involved were not familiar with the administration of technical procedures applicable to post modification testing and did not provide adequate supervision of the vendor technical representatives. Normally, System Engineering personnel would provide support for Post Modification Testing as specified in CCI-705, "Design Change and Modification Implementation." In this instance, a project manager inexperienced with Calvert Cliffs administration of technical procedures directed the testing without sufficient System Engineer involvement. There was a lack of attention to detail on the part of certain personnel involved in this testing.

II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

All of the SFP crane testing was successfully re-performed and properly documented.

This event was reviewed with System Engineering and Project Management personnel, emphasizing the requirements in CCI-705 concerning customer participation in projects.

The specific crane testing problems resulting in this violation were reviewed with all Project Management personnel, emphasizing the errors made.

Appropriate personnel actions have been taken.

III. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The above actions are sufficient to avoid similar future violations.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Because post-modification testing had not been previously completed, the crane had never been improperly certified or used for fuel movement. Full compliance with test requirements was achieved by suspending testing when the procedural compliance problems were discovered. The crane was subsequently successfully tested in accordance with procedures.