

# BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

April 5, 1982

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

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

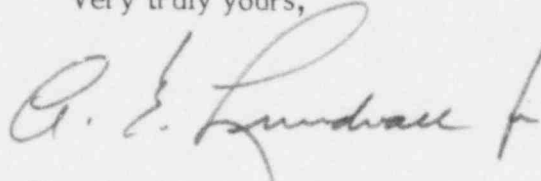
ATTENTION: R. W. Starostecki, Director  
Division of Project and Resident  
Inspection

Gentlemen:

This refers to your Inspection Report 50-317/82-04; 50-318/82-04 which transmitted two 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 March 8, 1982.

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

Very truly yours,



Vice President - Supply

AEL/DWL/gla

Enclosure

cc: J. A. Biddison, Esquire  
G. F. Trowbridge, Esquire  
D. H. Jaffe, NRC  
R. E. Architzel, NRC

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

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 made 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:

Ruth H. Grese  
Notary Public

My Commission Expires:

July 1, 1982

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/82-04; 50-318/82-04

ITEM A.1

Calvert Cliffs Operating Instruction-3, "Safety Injection, Shutdown Cooling, and Containment Spray," and Operating Instruction-16, "Component Cooling," each require that certain valves be locked in appropriate positions. On February 4, 1982, two valves were found to be in the correct positions with locking devices attached, but not locked as required. Red tags which serve to identify the valves as "locked open valves" were found to be in place along with the locking hardware.

The cause was apparently due to unlatching of the locking chains when the valve handwheels were painted during routine building maintenance. To prevent recurrence, the Plant Superintendent issued a memorandum to all Calvert Cliffs personnel informing them of this event, a previous event similar to this one and the potential for jeopardizing plant safety. The memorandum also instructed plant personnel that only Operations personnel are authorized to remove such devices. Additionally, all Operations personnel have been made aware of these violations with emphasis placed on their surveillance of locked valves to insure that locking devices are intact. Subsequent to this event, a review of the entire locked valve program had been initiated to clarify the commitments involved, define the extent of the program and to recommend actions for improving surveillance of locked valves to prevent further such events. This review should be complete by May 1, 1982.

ITEM A.2

The reason for the delay in completing the required shutdown margin determination was that the Shift Supervisor considered the CEA to be operable due to its proximity to the bottom of the core. When this decision was questioned by the NRC Resident Inspector, the Shift Supervisor consulted with the General Supervisor - Operations and it was decided that the CEA should be considered to be inoperable despite its low worth. Since no flexibility is allowed in the Emergency Operating Procedure (EOP) for stuck CEA's of such little consequence (Rod worth was equivalent to less than 1 ppm boron in this case), this EOP will be reviewed for possible modifications. All licensed operators will be apprised of the details of this event.