



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

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

May 13, 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
Inspections

Gentlemen:

This refers to your Inspection Report 50-317/82-05; 50-318/82-05, 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 April 16, 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

3205270 297

STATE OF MARYLAND:

: TO WIT:

CITY OF BALTIMORE:

John W. Gore, 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:

Luth H. Grese
Notary Public

My Commission Expires:

July 1, 1982

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/82-05; 50-318/82-05

Item A.1

The door of the Unit 2 Refueling Water Tank Room was removed with its permanently affixed radiation area sign approximately ten days prior to this event. A new door was installed, and a radiation area sign was temporarily attached using tape. Rounds by Radiation Control Technicians are made three times weekly to verify postings. Records indicate that the sign was in place as late as one day prior to this finding. Apparently the tape did not hold effectively for the ten day period. Shortly after verification of the missing sign by NRC Inspectors and a Radiation Control representative, an appropriate sign was affixed to the door with tape. Routinely the Radiation Control Unit temporarily affixes signs with tape. If the sign will be permanent, it is mounted with screws, epoxy cement, or other suitable means at a later date. The Radiation Control Technicians, who make rounds to verify postings, have been advised of this event. Also, they have been directed to verify the adequacy of mounting for the temporary radiation area signs.

Item A.2

Drawing 87-306E, Sheet 14, had been converted from a vendor's drawing to a Baltimore Gas & Electric drawing. When the drawing was converted, several outstanding DCN's were inadvertently omitted. The existing Baltimore Gas & Electric drawing control procedures make it possible to detect such omissions, however, those checks were not done. Print room personnel have been instructed to use the DCN index and the revision block of the drawing to verify that all DCN's are noted on the drawings prior to making them available for plant use.

Item A.3

Plant modifications necessary to meet NUREG-0737, Item II.B.2, involved both (a) the addition of shielding to allow post-accident access, and (b) modifications to piping/valve systems to provide for remote operation so as to obviate the need for post-accident access. Due to an oversight, the safety analysis addressed the shielding additions but not the modifications to systems. The system function whose operation has been changed from local to remote is described in the FSAR by virtue of the piping systems P&ID's being included as FSAR figures, and thus a safety analysis is required by 10 CFR 50.59. A safety analysis addressing the addition of valves and modifications to piping has been completed with the conclusion that an unreviewed safety question does not exist.

Following the PAS inspection in January, a complete review was conducted of our safety analysis processes. As a result of this review, more comprehensive guidelines and stricter criteria were developed for preparation and review of safety analyses. The level of training for engineers involved in the safety analysis preparation and review process was also improved. This expanded program has now been implemented and we believe that it will eliminate omissions such as the subject violation.