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GEORGE C. CREEL
VICE PRESIDENT
NUCLEAR ENERGY
(301) 260-4455

July 3, 1990

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
NRC Region I Resident Inspection Report Nos. 50-317/90-08 and
50-318/90-08

REFERENCE: (a) Letter from J. C. Linville (NRC) to G. C. Creel (BG&E), dated
June 4, 1990, same subject

Gentlemen:

Attachment (1) is our response to the Notice of Violation contained within the subject Inspection Report.

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

Very truly yours,

GCC/JV/bjd

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
L. E. Nicholson, NRC
R. I. McLean, DNR

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ATTACHMENT (1)

REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORT 50-317/90-08 AND 50-318/90-08

STATEMENT OF VIOLATION

Calvert Cliffs Technical Specification 6.8.1 states that written procedures shall be established, maintained, and implemented covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. Appendix "A" of Regulatory Guide 1.33, Rev. 2, 1978, requires administrative procedures for equipment control (e.g., locking and tagging). Administrative procedure Calvert Cliffs Instruction (CCI)-309B requires that the operation of any locked valve be annotated and approved in the "Locked Valve Deviation Log".

Contrary to the above, on April 20, 1990, three valves were unlocked and repositioned in the Waste Gas Decay system without adequate documentation and verification which resulted in an unplanned release of the #13 Waste Gas Decay Tank.

BACKGROUND

An unplanned release of #13 WGDT occurred during the recent startup of Unit One. The event was reviewed by our Startup Review Board which consisted of all site Managers. Evidence of insufficient attention to detail and informality of communications was revealed. This has received management attention and additional emphasis through communications and monitoring will be provided.

A Human Performance Evaluation System review was performed and identified the lack of clarity regarding the intent of CCI-309B, "Locked Valves," as contributing to the event. The following specific problems were noted in CCI-309B:

CCI-309B states that, "Whenever any locked valve is taken out of its locked position, such deviation shall be logged in the Locked Valve Deviation Log." However, CCI-309B does not specify that the valve be logged before it is taken out of its locked position. In this event, the log was completed after the valve was taken out of its locked position.

CCI-309B requires that the Control Room Supervisor (CRS) approve a locked valve deviation before the valve is placed in the out of normal position, but does not specify how the approval must be given. A space is provided in the log for his initials approving the deviation, but since the log is not required before the valve manipulation, the procedure implies that he can give his approval by other methods. In this case, CRS permission was given to manipulate the valves prior to their being logged by directing the WGDT release to be performed.

The event and all corrective actions are discussed in LER 50-317/90-16.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN

The intent of CCI-309B regarding control of locked valves was formally communicated in writing to the operating shifts. A valve deviation sheet will be completed prior to operating locked valves and the Control Room Supervisor will document his approval of those operations by initialing the sheet.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A revision to CCI-309 to clarify the required documentation and verification of the operation of locked valves has been recommended for approval by the Plant Operations and Safety Review Committee and is expected to be implemented by July 31, 1990.

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DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the formal written communication of the intent of CCI-309B to the operating shifts on April 24, 1990.