

ROBERT E. DENTON
Vice President
Nuclear Energy

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 586-2200 Ext. 4455 Local
410 260-4455 Baltimore

August 17, 1994



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 NRC Region I Resident Inspection Report Nos. 50-317(318)/94-20

REFERENCE: (a) Letter from C. J. Cowgill (NRC) to R. E. Denton (NRC), dated July 18, 1994, NRC Region I Resident Inspection Report Nos. 50-317/94-20 and 50-318/94-20 (May 29, 1994 - July 2, 1994)

In response to Reference (a), Attachment (1) details our response to the cited violation.

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

Very truly yours,

RED/MDM/bjd

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
P. T. Kuo, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC

220062
9408240318 940817
PDR ADDCK 05000317
PDR

IEOL
1/1

ATTACHMENT (I)

TEMPORARY ALTERATION -- NOTICE OF VIOLATION

I. DESCRIPTION AND CAUSE

10 CFR Part 50, Appendix B, Criterion III, Design Control, states, in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis, ... are correctly translated into specifications, drawings, procedures, and instructions ..." Contrary to the above, on April 25, 1994, a Temporary Alteration (TA) installed a trial chemical additive system (Clamtrol) monitor at the same connection point used to cross-connect the safety-related Saltwater (SW) system to the Service Water (SRW) system, under emergency conditions. Specifically, the evaluations contained in the TA package were not re-verified against the current configuration even though an extended period had existed since initial design approval.

Baltimore Gas and Electric Company accepts the violation.

In November, 1992, a method was developed at Calvert Cliffs for emergency filling of the SRW system from the SW system via a temporary hose connection. The necessary equipment was staged, operators were trained, and a request for procedure activity was generated to change Operating Instruction (OI)-15 "Service Water System."

In the period May to July 1993, engineering personnel developed a TA to install a Clamtrol monitor at the same connections as the emergency fill hose. The TA process at Calvert Cliffs is used to control those temporary changes to plant configuration that modify the design of plant equipment. Temporary Alterations are typically initiated by system engineers and require design evaluations.

In accordance with the TA process, the SW lead system engineer evaluated whether any procedures would require revision because of the TA. The system engineer felt under emergency conditions it would be readily apparent to the operators tasked with establishing the SW-SRW cross-connect that the Clamtrol monitor would need to be removed and that its removal was within the skill of the craft. He documented on the TA checklist that no procedure changes were required, but did not specifically comment on OI-15, which had not yet been changed. The TA was approved in July, 1993.

In October 1993, the emergency SW-SRW cross-connect was formalized in a revision to OI-15. The process did not require a review or revision of the pending Clamtrol TA package.

On April 25, 1994, the TA was implemented. The process only required approval of the Shift Supervisor. No validation by engineering personnel was required, and therefore no review which would have considered OI-15 was documented. The TA process was inadequate in not requiring an additional implementation review, given the age of the TA, thereby causing this violation.

II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

In response to this event, OI-15 was revised to provide specific direction to remove any hoses connected to the emergency SW-SRW cross-connection points prior to connecting the emergency cross-connect hoses.

ATTACHMENT (I)

TEMPORARY ALTERATION -- NOTICE OF VIOLATION

III. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

To improve the TA process, a step will be added to the TA procedure to require that all TAs will receive an engineering evaluation not greater than 30 days prior to installation. This review will be performed to check that the original evaluation conclusions are still valid.

We have verified the Facility Change Request and Minor Change Request processes have controls that alert personnel making plant configuration changes of pending permanent plant modifications. Additionally, the processes require reviews by various organizations at the time the modification is installed.

All system engineers will be trained on this event to reinforce the importance of consulting affected groups when evaluating the need for specific procedural guidance.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved on August 31, 1994 when the interim guidance describing the procedure change above will be implemented via a Plant General Manager memorandum.