



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

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

March 10, 1983

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 & Resident
Programs

Gentlemen:

This refers to your Inspection Report 50-317/82-30 50-318/82-27, which transmitted one item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to that item noted in your letter of February 9, 1983.

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

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT NO. 50-317/82-30; 50-318/82-27

During the 1982 refueling outage of Calvert Cliffs Unit 1 and prior to May 3, 1982, temporary lead shielding was applied to safety-related systems inside the Containment Building without formal controls. Before May 3, 1982, no approved criteria existed for the application of temporary lead shielding at the Calvert Cliffs Nuclear Power Plant. With the approval of guidelines for temporary lead shielding on May 3, 1982, appropriate plant personnel were made aware that no shielding should be installed without formal controls.

We disagree with the violation as noted in Appendix A of NRC Inspection Report 50-317/82-30; 50-318/82-27, and believe that issuance of a Non-Conformance Report (NCR) was inappropriate in this case. However, we acknowledge the need for formal procedures to control the application of lead shielding to safety-related systems. Subsequent to May 3, 1982, we refrained from installing additional lead shielding at the Calvert Cliffs plant until a formal procedure had been written and approved to control this activity.

The shielding installed during the refueling outage of Calvert Cliffs Unit 1 was removed and a visual inspection of the associated piping was conducted by qualified Non-Destructive Examination Inspectors prior to plant start-up with no damage detected. Later, your concerns caused us to reanalyze the associated piping. This reanalysis demonstrated that no additional stresses were permanently induced in the piping systems. All identified shielding on safety-related pipes/components in the Auxiliary Building has been removed. Any shielding used during the recent refueling outage of Calvert Cliffs Unit 2 (Oct. 82-Jan. 83) was controlled in accordance with Radiation Safety Procedure (RSP) 2-216 entitled, "The Services of the Operational Maintenance Assistance Radiological Team (OMAR)." This procedure was approved on September 29, 1982, for Calvert Cliffs Unit Nos. 1 & 2. The following is a summary of the pertinent information from RSP 2-216 concerning shielding:

1. Prior to the application of shielding or the addition of shielding to safety-related pipes/components a completed stress analysis is required and must be attached for use to the OMAR Work Request Forms. This is the responsibility of the OMAR Work Leader. (Stress analysis is defined by this procedure as detailing the location, component, maximum allowable weight, and type of shielding being applied).

- NOTE -

This does not apply to shielding
which is supported by independent
structures such as braces or scaffolding.

2. The Quality Control Group is notified by the OMAR Work Leader prior to the application of shielding, the addition of shielding, or the removal of shielding. Appropriate QC sign-offs are include on OMAR Work Request Forms.

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3. Only OMAR applies, adjusts, or removes the subject shielding with the approval of the ALARA Coordinator/Radiological Control Shift Supervisor.
4. The subject shielding material is secured in a manner that will not shift or move once in place. (Indicator tape has been used to monitor for tampering or shield movement).
5. When QA/QC requires equipment accountability, each piece of shielding is stenciled or marked numerically for ease of accountability.
6. Once secured, a sign is attached in a manner so as to be readily visible and not easily removed with the wording (or equivalent), **"DO NOT MOVE OR ALTER THIS SHIELDING WITHOUT RCSS APPROVAL."**
7. All OMAR functions including shielding activities are entered on the OMAR Work Request Issue Log.

- NOTE -

All temporary lead shielding is removed before systems are required for operation unless specific relief is approved and supported by a safety analysis. Subject shielding is only applied according to the guidelines contained in the stress analysis.