

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



September 23, 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
Unit 1 Containment Housekeeping Notice of Violation

REFERENCE: (a) Letter from Mr. C. J. Cowgill (NRC) to Mr. R. E. Denton (BGE), dated
August 25, 1994, Notice of Violation, Combined Inspection Report
Nos. 50-317/94-24 and 50-318/94-24

Attachment (1) is provided in response to Reference (a).

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

Very truly yours,

RED/DWM/bjd

Attachment

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

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ATTACHMENT (I)

NOTICE OF VIOLATION 50-318/94-24-03

Notice of Violation 50-318/94-24-03 describes a non-conformance involving loose debris in the Unit 1 containment that could potentially have restricted containment sump flow during loss-of-coolant accident conditions, violating Technical Specification 4.5.2.c.1. Prior Baltimore Gas and Electric Company inspections failed to identify this debris.

I. DESCRIPTION AND CAUSE OF EVENTS

During preparations for Unit 1 heat up following the spring 1994 Unit 1 refueling outage, Nuclear Operations personnel conducted tours of the Unit 1 containment for the purpose of verifying containment cleanliness. Guidance for these inspections is located in Operating Procedure (OP)-6, "Pre-Startup Checkoff." Per OP-6, containment cleanliness walkdowns are required prior to heating up the plant to Mode 4 to meet the intent of Technical Specification Surveillance Requirement 4.5.2.c.1. Despite a total of four inspections between May 26 and July 21, 1994, including an inspection during a June forced outage, some industrial debris remained until it was found in mid-July following the discovery of debris in the reactor coolant pump bays by an Nuclear Regulatory Commission resident inspector.

Most of the recovered debris was in hard-to-detect and dimly lit locations. Ambient and carried lighting was insufficient for performing the visual inspections. The bulk of the material was located in the Pressurizer middle level, which was not included on the OP-6 inspection sheet. Also, the manner in which OP-6 was implemented did not ensure proper execution of the surveillance requirement. Procedure OP-6 is not designed to document containment cleanliness exclusively. It requires a number of actions to be taken and is generally assigned to plant or licensed operators who are charged with a variety of responsibilities during plant startup. Instead of thorough, focused searches for debris, tours of the containment were conducted in conjunction with (or as adjuncts to) other functions required by the procedure. This dilution of purpose facilitated inadequate attention to detail.

A potential contributor to this condition is that there has existed an incorrect interpretation of the requirements on the part of Operations and plant personnel. It was believed that only debris "challenging Safety Injection System operability" was applicable. The Technical Specification wording, however, requires that debris which can "restrict flow" through the sump screen must be removed. The former interpretation was too permissive and did not meet the intent of the more rigorous Technical Specification wording. The guidance contained in OP-6 did not dispel this misinterpretation.

II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Corrective actions taken included immediately notifying all Operations supervisors and significant outage stakeholders of Operations management expectations regarding housekeeping and inspections in the containment. A change was made to OP-6 to ensure management expectations are clearly communicated to Operations personnel conducting general area tours. This change also provided very clear guidance on areas to search, as well as requiring senior licensed operators to perform, and the General Supervisor-Nuclear Plant Operations to review, the inspections. A Request for Procedure Activity was submitted to ensure these same expectations are communicated in Calvert Cliffs Instruction (CCI)-115, "Containment Access Requirements."

ATTACHMENT (1)

NOTICE OF VIOLATION 50-318/94-24-03

III. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Although many support groups on site are held accountable for maintaining containment cleanliness, Licensed Operators are ultimately responsible for ensuring that the requirements of Technical Specification 4.5.2.c.1 are properly met. The new procedural guidance provided to Operators provides clear standards for conducting closeout inspections. Provision is being made for Operators to use more powerful lighting to locate hard-to-find debris during future closeout inspections. Additionally, guidance provided to other outage stakeholders communicates Operations' expectations in very strong terms. The Plant General Manager has informed appropriate non-operations personnel of his expectations regarding their responsibility for containment cleanliness. Operators will bring shortcomings by other organizations to Operations management's attention and will document significant problems using the Issue Report system.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on July 23, 1994, when the debris was removed from the Unit 1 containment.