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February 16, 1995

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  
Compensatory Fire Watch Notice of Violation

REFERENCE: (a) Letter from Mr. C. J. Cowgill (NRC) to Mr. R. E. Denton (BGE), dated  
January 17, 1994, Notice of Violation, Combined Inspection Report  
Nos. 50-317/94-34 and 50-318/94-33

In response to Reference (a), Attachment (1) is provided.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "R. E. Denton", is written over a horizontal line. The signature is fluid and cursive.

RED/DWM/bjd

Attachment

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
L. B. Marsh, 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 (1)

### NOTICE OF VIOLATION 50-317/94-34-01 AND 50-318/94-33-01

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Notice of Violation 50-317/94-34-01 and 50-318/94-33-01 describes a non-conformance involving 45 instances between June and December 1994 in which, contrary to the requirements of administrative procedure SA-1-100, "Fire Prevention Program," individuals assigned continuous fire watch duties were assigned concurrent duties, and the "Responsibilities of Fire Watch" section of SA-1-100 Attachment 11, "Fire Watch Patrol Log/Sprinkler Alarm Test Log," were not filled out.

#### I. REASON FOR THE VIOLATION

On November 30, 1994, contract painters were assigned to paint Battery Rooms 11, 12, and 22. They obtained Fire Barrier Permits per SA-1-100 but did not fill out a Fire Watch Patrol Log as required by the procedure. A Nuclear Regulatory Commission Resident Inspector later observed one of the painters alone in the 12 Battery Room with the door open. This door is a normally shut door, which, per Technical Specification 3.7.12, may only be breached if a fire watch is posted. When asked if he was standing fire watch, the painter replied that he was. When questioned, the acting Safety and Fire Protection Supervisor replied that it is normal practice for individuals to function as fire watch while performing other work. The inspector questioned the Operations Shift Supervisor, who shut down the job.

Subsequent investigation revealed that Safety and Fire Protection personnel did not consistently correctly interpret the procedure. The technician who issued the Fire Barrier permits believed that Attachment 11 was only required for hourly and not for continuous fire watches. He did not require a separate fire watch because the description in SA-1-100 of compensatory fire watch states that the fire watch will be the "primary" responsibility of the watchstander. The technician interpreted this to mean that the individual could have other duties. Attachment 11 to the procedure, which is required for all fire watches, including continuous fire watches, requires that fire watch be the individual's only duty. Following the discovery of the event, the acting Supervisor made a similar interpretation when he was questioned. In addition, he believed that it was common sense that such a small room would not require a second person to stand fire watch.

Follow-up investigation revealed 44 similar instances between June and December 1994. No instances were found where a fire watch was not assigned. Technical Specification 3.7.12 requires a fire watch for a breached fire barrier but does not specify that fire watch be an individual's only duty. None of the instances found involved a violation of the Technical Specification.

In February 1994, administrative procedure SA-1-100 replaced an earlier Calvert Cliffs Instruction CCI-133, which contained similar requirements. A lack of clarity in the procedure contributed to the misinterpretation. The procedure text concerning compensatory fire watches states that fire watch will be an individual's "primary duty." Attachment 11 states that fire watch will be an individual's "only duty." Those individuals who believed that Attachment 11 was not applicable to continuous fire watches interpreted the text of the procedure to allow other activities concurrent with fire watch duties. The misinterpretation of the procedure persisted largely as a result of Safety and Fire Protection personnel having not fully implemented management's expectations regarding use of procedures. The group's supervisor had not assessed his unit's procedural performance.

## ATTACHMENT (I)

### NOTICE OF VIOLATION 50-317/94-34-01 AND 50-318/94-33-01

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An additional contributing cause of the violation is unnecessary assignment of continuous fire watches. So long as means for fire detection and suppression are present, it is not necessary to post a continuous fire watch nor is it a good use of resources. In virtually every case where a continuous fire watch did not complete Attachment 11, an hourly fire watch would have been permitted per Technical Specification 3.7.12. The lack of self-assessment in the Safety and Fire Protection unit resulted in persistence of this overly strict practice.

#### II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Upon determination that the procedure was not being complied with, work involving fire barrier breaches was discontinued until the requirements of the procedure were properly understood and met. Safety and Fire Protection personnel were made aware of the proper interpretation of the procedure and reminded of management's expectations regarding procedure use. Safety and Fire Protection supervision has taken steps to implement a program of periodic self-assessment.

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

Procedure SA-1-100 has been revised to further clarify the responsibilities of compensatory fire watches and to remove, as appropriate, unnecessarily restrictive procedure steps.

#### IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on December 1, 1994, when personnel were informed of the proper interpretation of SA-1-100 and work under SA-1-100 was recommenced.