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1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 495-4455



February 23, 1996

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 Request for Additional Information; Inspection Report
Nos. 50-317/95-08 and 50-318/95-08

REFERENCES: (a) Letter from Mr. L. T. Doerflein (NRC) to Mr. R. E. Denton (BGE), dated
January 22, 1996, Inspection Report Nos. 50-317/95-08 and
50-318/95-08 (REPLY)

(b) Letter to Document Control Desk (NRC) from Mr. R. E. Denton (BGE),
dated November 21, 1995, Reply to Notice of Violation - NRC Inspection
Report Nos. 50-317 (318)/95-08

Please find attached our response to Reference (a). In this letter you requested that we discuss why the reviews conducted as part of our Fire Barrier Penetration Seal Review Project, which was initiated in 1991, and the review of the April 14, 1995 fire in an expansion joint at our facility, did not identify that the expansion joints did not meet 10 CFR Part 50, Appendix R, requirements for fire barriers.

As detailed in Attachment (1) during the Fire Barrier Penetration Seal Project, we did identify as early as 1992 that the expansion joints in our facility were not tested or rated to meet the requirements of Appendix R fire barriers, and in 1994, we evaluated the typical expansion joint seal civil standard for Calvert Cliffs under the guidance contained in Nuclear Regulatory Commission Generic Letter 86-10, Implementation of Fire Protection Requirements. The Generic Letter 86-10 evaluation found that the typical expansion joint seal in our civil standard was adequate to withstand the hazards associated with the fire areas in the plant. The Fire Penetration Seal Review Project walkdowns were conducted, starting in 1995, using the expansion joint civil standard as the qualification standard for expansion joints. Issue Reports were issued for all penetration seals that did not meet their qualification standard during the walkdowns associated with the Penetration Seal Review Project, including expansion joints. The first

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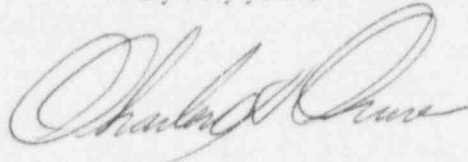
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degraded expansion joint found during the Penetration Seal Review Project walkdowns was documented on an Issue Report and provided with a temporary seal in March 1995, just a month before the fire occurred. The expansion joint fire on April 14, 1995 occurred in an expansion joint that had not yet been inspected as part of the Penetration Seal Review Project walkdowns. The expansion joint that the fire occurred in would not have been considered an acceptable configuration if it had inspected under the walkdowns.

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

Very truly yours,



CHC/CDS/dlm

Attachment: (1) Response to Request for Additional Information; Inspection Report
Nos. 50-317/95-08 and 50-318/95-08

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
L. B. Marsh, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
Resident Inspector, NRC
R. I. McLean, DNR
J. H. Walter, PSC

ATTACHMENT (I)

BALTIMORE GAS AND ELECTRIC COMPANY RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION; INSPECTION REPORT NOS. 50-317/95-08 AND 50-318/95-08

In response to Reference (a), you requested that we discuss why the reviews conducted as part of our Fire Barrier Penetration Seal Project, which was initiated in 1991, and the review of the April 14, 1995 fire in an expansion joint at our facility, did not identify that the appropriate expansion joints in our facility did not meet 10 CFR Part 50, Appendix R, requirements for fire barriers.

Our penetration seal project did identify that expansion joints were not tested or rated to meet the requirements of Appendix R fire barriers as early as 1992. When this issue was identified, an evaluation was performed regarding expansion joints in fire barriers under the guidance contained in Generic Letter (GL) 86-10, Implementation of Fire Protection Requirements. This GL 86-10 evaluation justified the civil standard as an acceptable configuration. Issue Reports were issued for expansion joints seals that were found not to meet the civil standard during the Fire Barrier Penetration Seal Project walkdowns in 1995. The April 14, 1995 fire occurred in an expansion joint that had not yet been inspected under our Fire Barrier Penetration Seal Project walkdowns.

In 1991, Facility Change Request 91-205 was approved to perform a Fire Barrier Penetration Seal Project to address the issues raised in Nuclear Regulatory Commission Information Notice 88-04, Inadequate Qualification and Documentation of Fire Barrier Penetration Seals. In 1992, a task force was initiated to revisit and review our overall Appendix R program to ensure continued compliance was maintained. The task force identified expansion joints as one of many wall configurations that needed to be reviewed. In 1993, expansion joints were incorporated into the Fire Barrier Penetration Seal Project. This project was sent out for bid and work started in 1994.

The first phase of the Fire Barrier Penetration Seal Project started in 1994. The first phase involved a review of the available documentation to ensure that all penetration seal details (including expansion joints) were identified and supported by tests or engineering evaluations. For penetration seal configurations not supported by tests or engineering evaluations, an evaluation was conducted in accordance with (GL) 86-10 to justify the designs. The typical expansion joint design in the plant, as described in the civil standard was found to be adequate to withstand the hazards associated with the fire areas in the plant. The expansion joint design justified under GL 86-10 contained a polysulfide exterior coating. Expansion joints with no polysulfide exterior coating, such as the one involved in the April 14 fire, were not considered acceptable fire barrier penetration seals during the walkdown phase of the Fire Barrier Penetration Seal Project.

In 1995, the second phase of the penetration seal review project began involving fire barrier penetration seal walkdowns. The detailed walkdowns of fire barriers in the plant were in progress at the time of April 14, 1995 expansion joint fire. The walkdowns were designed to document the type and location of each fire barrier penetration seal (including expansion joints), and document any degraded seals in the plant. As the walkdowns noted degraded fire barrier penetration seals, Issue Reports were generated.

In March 1995, personnel performing the walkdowns noted an expansion joint which did not meet the civil standard. A temporary seal was installed in the degraded expansion joint per plant procedures and an Issue Report was prepared. The penetration seal walkdown process then continued, as planned, using a systematic elevation-by-elevation approach. The Issue Report was the mechanism utilized to initiate the corrective action to permanently repair the unacceptable expansion joint.

ATTACHMENT (I)

BALTIMORE GAS AND ELECTRIC COMPANY
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION;
INSPECTION REPORT NOS. 50-317/95-08 AND 50-318/95-08

The fire in the expansion joint that occurred on April 14, 1995 was in a fire barrier that had not yet been inspected under the Fire Barrier Penetration Seal Project. The fire prompted us to evaluate the ability of the plants expansion joints in fire areas to meet the function of a fire barrier as described in the plants Technical Specifications. Details concerning the evaluation and our follow-up actions after the April 14, 1995 expansion joint fire are discussed in Reference (b).