

APPENDIX A

NOTICE OF VIOLATION

Baltimore Gas and Electric Company
Calvert Cliffs Units 1 and 2

Docket/License: 50-317; DPR-53
50-318; DPR-69

As a result of the inspection conducted on May 6 - June 17, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2 Appendix C) the following violation was identified:

Technical Specification 6.8.1a requires that procedures be established, implemented, and maintained covering the applicable procedures referenced in Appendix A to Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, 1978 requires plant procedures for changing operating modes from Cold Shutdown to Hot Standby and performing surveillance tests.

Calvert Cliffs Operating Procedure OP-1, Revision 26, "Plant Startup from Cold Shutdown" requires (General Precaution I.E. and Initial Condition II.A.4) that whenever the shutdown cooling system is in operation, Reactor Coolant System (RCS) pressure shall not exceed 270 psia.

Contrary to the above, at 10:45 a.m. on June 2, 1985, Unit 1 shutdown cooling flow was lost when RCS pressure was allowed to increase above 284 psia which, as designed, caused automatic closure of a shutdown cooling return isolation valve.

Section V of Calvert Cliffs Surveillance Test Procedure STP M-220-2, Revision 10, "ESFAS (Engineered Safety Features Actuation System) Functional Test", requires removal of each Refueling Water Tank (RWT) level switch channel, one at a time, for testing. General Precaution B of the STP emphasizes that only one channel is to be affected by the test ("be in a test mode") at any one time.

Contrary to the above on May 23, 1985, STP M-220-2 was conducted on Unit 2 in such a manner that two of four RWT level switch channels were affected (tripped) at one time. With one channel under test and in a tripped condition, the cover was removed from a second channel's level switch. That action caused the second channel to trip and generated a Recirculation Actuation Signal (RAS).

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.