

AUG 29 1985

Docket Nos. 50-317
50-318

CAL 85-13

Baltimore Gas and Electric Company
ATTN: Mr. A. E. Lundvall, Jr.
Vice President, Supply
P. O. Box 1475
Baltimore, Maryland 21203

Gentlemen:

Subject: Combined Inspection Nos. 50-317/85-16; 50-318/85-14

This letter confirms your commitments made during a telephone conference held on August 23, 1985, between Mr. J. Tiernan, Manager, Nuclear Power, and other members of your staff and Messrs. T. Martin, W. Kane, and other members of my staff. The issues addressed were discussed during a recent Enforcement Conference held in the Region I office on August 14, 1985 concerning your implementation of certain NUREG-0737 items. These issues involved technical, administrative and managerial problems which led to the deterioration of post-accident sampling, analyses and measurements capabilities of reactor coolant, reactor containment and effluent parameters.

With regard to the matters discussed, it is our understanding that the following actions have been or will be taken by September 20, 1985.

- A. Verify operability of the Combustion Engineering Post-Accident Sampling System (CE-PASS) grab sampling capability. Operability will be demonstrated by drawing samples from the reactor coolant system and demonstrating analytical accuracy required by NUREG-0737. Any concerns with analytical accuracy will be resolved with the NRC staff.
- B. Establish a procedure for periodic surveillance of the capability to dilute CE-PASS grab samples to ensure accurate assessment of chemical/isotope concentrations within tolerances specified in NUREG-0737.
- C. Establish an action plan and schedule for implementing, (i) a permanent post-accident sampling capability which satisfies NUREG-0737 analytical requirements and (ii) a post-accident radioiodine and particulate effluent monitoring capability that provides representative measurements of the effluent stream from each reactor unit vent stack.

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Such action plan shall include:

1. Designation of an individual assigned the responsibility of planning, organizing, directing and controlling implementation.
2. Establishment and implementation of detailed pre-operational test procedures for verifying and validating system performance and capability, including:
 - a. instrument calibration and accuracy,
 - b. representative sampling,
 - c. operability of all system components,
 - d. practicability of associated operating, and emergency procedures.
3. Establishment and implementation of
 - a. periodic surveillance testing procedures to assure continued operability, and
 - b. a program to assure that sufficient numbers of personnel are trained and remain competent in the ability to operate the systems, analyze samples and evaluate results.
- D. Establish an administrative procedure for auditing compliance with new Technical Specification requirements, including: preparation of procedures, training of personnel, successful completion of necessary preoperational testing, and establishment of required surveillance testing program, within one month of the required implementation of the actions.
- E. Review and revise, as necessary, the procedures for prioritizing all maintenance activities to assure that systems required to be operable are expeditiously returned to operable status. These procedures shall include procedures for systems covered either by license condition or licensee commitment. Senior Baltimore Gas & Electric Plant Management shall be kept aware of the status of these systems.

If your understanding of these commitments does not agree with ours, please inform this office within 24 hours of receipt of this letter. The implementation of these actions will be reviewed in a subsequent inspection of your program.

Sincerely,

Original Signed By:

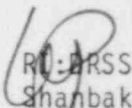
Thomas E. Murley
Regional Administrator

cc:

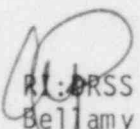
R. M. Douglass, Manager, Quality Assurance
L. B. Russell, Plant Superintendent
Thomas Magette, Administrator, Nuclear Evaluations
R. C. L. Olson, Principal Engineer
J. A. Tiernan, Manager, Nuclear Power
R. E. Denton, General Supervisor, Training and Technical Services
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Maryland (2)

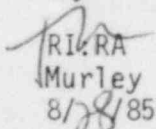
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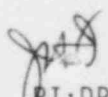
Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encl)
DRP Section Chief
M. McBride, RI, Pilgrim
J. Allan, RI
J. Gutierrez, RI
C. Poitier, RI

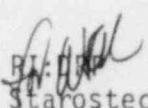

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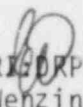
RI:DRA
Allan
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RI:DRSS
Bellamy
8/28/85


RI:RA
Murley
8/28/85


for RI:DRSS
Martin
8/28/85


RI:DRP
Starostecki
8/28/85


RI:DRP
Wehinger
8/28/85