

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No. 85-29  
85-30

Docket No. 50-317  
50-318

License No. DPR-53  
DPR-69

Priority --

Category C

Licensee: Baltimore Gas and Electric Company

P. O. Box 1475

Baltimore, Maryland 21203

Facility Name: Calvert Cliffs Nuclear Power Plant Units 1 and 2

Inspection At: Lusby, Maryland

Inspection Conducted: October 21-25, 1985

Inspector: *M. Shanbaky*  
*for* Percy E. Clemons, Radiation Specialist

11/19/85  
date

Approved by: *M. Shanbaky*  
Mohamed M. Shanbaky, Chief, PWR, Radiological  
Safety Section, Emergency Preparedness  
and Radiological Protection Branch, DRSS

11/19/85  
date

Inspection Summary: Inspection on October 21-25, 1985 (Report Nos. 50-317/85-29 and 50-318/85-30).

Areas Inspected: Routine, unannounced safety inspection of transportation activities including: shipments, Part 61, procedures, advance notification, training, purchase orders, outstanding items and audits. The inspection involved 33 inspector hours onsite by one region-based inspector.

Results: No violations were identified.

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## DETAILS

### 1.0 Persons Contacted

#### 1.1 Licensee Personnel

L. Russell, Plant Superintendent  
N. Millis, General Supervisor-Radiation Safety  
M. Roberson, General Supervisor-Inspections Quality Assurance  
P. Cornigan, General Supervisor-Chemistry  
J. Carlson, Assistant General Supervisor-Radiation Control and Support  
J. Lenhart, Supervisor, Materials Processing  
P. Rizzo, Supervisor, Technical Training  
L. Smialek, Senior Plant Health Physicist  
W. Putman, Senior Quality Assurance Auditor  
B. Watson, Plant Health Physicist  
W. Cartwright, Engineer-Chemistry  
W. Rentz, INPO

Other licensee personnel were contacted and interviewed during this inspection.

### 2.0 Purpose

The purpose of this routine inspection was to review the licensee's transportation activities with respect to the following:

- Review of shipments of radioactive material;
- Review of procedures;
- Review of outstanding items;
- Review of advance notification;
- Review of training;
- Review of a purchase order;
- Review of Part 61 requirements; and
- Review of audits.

### 3.0 Status of Previously Identified Items

(Closed) Inspector Followup Item (84-32-05) Verify Pump #165 was calibrated at various hose lengths. The inspector reviewed documents that indicated that Pump #165 had been calibrated in conjunction with numerous other pumps.

### 4.0 Training

Personnel training in transportation activities was reviewed against the criteria contained in 10 CFR 71.105, "Quality Assurance Program", and IE Bulletin No. 79-19, "Packaging Of Low-Level Radioactive Waste for Transport and Burial."

The licensee performance relative to these criteria was determined by discussions with Training personnel, the Materials Processing Supervisor and by reviewing records.

Within the scope of this review, no violations were identified.

#### 5.0 Shipments of Radioactive Material

The licensee's program for the transportation of radioactive material was reviewed against the criteria in 10 CFR 71.12, "General License: NRC Approved Package." The licensee's performance relative to these criteria was determined by interviewing the Supervisor, Materials Processing and by reviewing appropriate documents.

Within the scope of this review, no violations were identified.

#### 6.0 Procedures

The adequacy and effectiveness of the licensee's procedures were reviewed against the criteria contained in Technical Specification 6.8, "Procedures".

Procedures reviewed included:

Procedure No. RSP 2-202, "Low Level Solid Radioactive Waste Control".

Procedure No. RSP 2-204, "Packaging, Labeling and Shipment of Radioactive Materials".

Procedure No. RSP 2-203, "Handling Highly Radioactive Materials".

Procedure No. RSP 2-206, "Chem-Nuclear CNSI 1-13G Cask Handling Procedure".

Procedure No. RSP 2-208, "HN-100 Series, 1, 2 and S Cask Handling Procedure".

Procedure No. RSP 2-218, "CNSI 14-195H Cask Handling Procedure".

Within the scope of this review, no violations were identified, however, lack of procedures for compliance with 10 CFR 61 requirements were discussed with the licensee (Details, paragraph 9.0).

#### 7.0 Advance Notification

The licensee's efforts in providing the required information to respective States when transporting significant quantities of licensed material to, through or across the boundary of the state was reviewed against criteria contained in 10 CFR 71.97, "Advance notification of shipment of nuclear waste". The adequacy of the licensee's efforts was determined by discussion with the Materials Processing Supervisor and by reviewing records.

Within the scope of this review, no violations were identified.

#### 8.0 Purchase Order

On October 22, 1985, the inspector reviewed the licensee's log book for the shipment of radioactive material during 1985. The inspector noted that the licensee made two shipments of used respirator filter cartridges to a firm in South Carolina. The inspector was informed that the filters were sent to this firm to have them tested so that they could be used again.

The inspector reviewed Purchase Order NO. 58929-G, and he noted that the licensee did not specify any requirements in the purchase order that the firm would have to meet. The purchase order did contain the following:

"Efficiency Testing Service for Respirator Filter Cartridges (Using Mono-dispersed Thermally Generated DOP Aerosol)".

No specific requirements were neither given to the contractor nor agreed upon by the licensee and the contractor to ensure compliance with the applicable regulatory requirements for filter testing as indicated by the Purchase Order.

The licensee conducted a quality assurance audit of the firm's program in South Carolina on November 15, 1983, and the results of the audit were reported in QAG 60--MTI 83--Program 01. The inspector review of the audit report verified that audit included curtain filter testing requirements.

Improvements in purchase order specifications and vendor certification on filter testing will be examined during a subsequent inspection (85-29-01 and 85-30-01).

Within the scope of this review, no violations of regulatory requirements were identified.

#### 9.0 Part 61

On May 11, 1983, the NRC issued its "Final Waste Classification And Waste Form Technical Position Papers". The purpose of this document was to provide guidance to licensee's in establishing a program that would be acceptable to the NRC in determining the presence and concentrations of radionuclides listed in 10 CFR 61, the licensee identified four waste streams that would be sampled and analyzed. The waste streams were identified as:

- a. Unit 2 reactor coolant
- b. CVCS resin
- c. Miscellaneous resin
- d. Smears

Samples were collected and analyzed from each stream during the period of September - December, 1983, inasmuch as 10 CFR 61 would become effective December 27, 1983.

On page 6 of the Branch Technical Position Papers, it is stated "...for most facilities and for most Class B and C waste types, this confirmatory analysis should be performed on at least an annual basis..."

During this inspection in discussion with the General Supervisor-Chemistry and the Engineer-Chemistry, the inspector determined that the licensee did not have a program, including implementing procedures, for identifying, sampling, and analyzing the various waste streams to assure compliance with 10 CFR 61.

The licensee has not developed procedures to determine the presence and concentrations of radionuclides for classification purposes, and neither developed procedures for performing confirmatory analyses as stated in the Branch Technical Position Papers. This item and related procedures required for compliance with 10 CFR 20.311 will be reviewed in a subsequent inspection (85-29-02 and 85-30-02).

#### 10. Audits

The adequacy and effectiveness of the licensee's audit program for transport packages were reviewed against the criteria contained in Criterion XVIII of Appendix B, 10 CFR 50.

The licensee's performance relative to these criteria was determined by interviewing a Quality Assurance Specialist, a Senior Quality Assurance Auditor, and the General Supervisor - Operations Quality Assurance, and by reviewing an audit report.

Within the scope of this review, the following was identified.

The inspector determined through discussion with the Senior Quality Assurance Auditor that Criterion IV, "Procurement Document Control", has never been specifically audited as applicable to transport packages. The Senior Quality Assurance Auditor stated that the procurement document process is routinely audited under the generic quality assurance audit program. The Auditor acknowledged that under the generic quality assurance program it was possible that Criterion IV for transport packages may never be specifically audited. The inspector identified this program weakness to licensee's management during the exit interview.

#### 11. Exit Interview

The inspector met with the licensee representatives October 25, 1985 (denoted in paragraph 1) at the conclusion of the inspection. The inspector summarized the scope of the inspection and the findings.

At no time during this inspection was written material provided to the licensee.