

May 29, 1997

EA No. 97-192

Mr. Charles H. Cruse
Vice President - Nuclear Energy
Baltimore Gas and Electric Company (BGE)
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657 - 4702

**SUBJECT: NRC REGION I INTEGRATED INSPECTION REPORT NOS. 50-317/97-02
AND 50-318/97-02 AND NOTICE OF VIOLATION**

Dear Mr. Cruse:

This refers to the inspection conducted at the Calvert Cliffs Nuclear Power Plant from March 2, 1997 to April 12, 1997 and on April 24, 1997. The enclosed report presents the results of the inspection. At the conclusion of the inspection, these findings were discussed with Mr. Katz and others of your staff.

Based on the results of this inspection, the NRC has determined that a violation of NRC requirements occurred. This violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding the issue are described in detail in Section E1.4 of the enclosed inspection report. The violation concerns inadequate corrective actions following identification of degraded conditions for one of the Unit 1 power operated relief valve block valves.

You are required to respond to the enclosed Notice and should follow the instructions specified in the Notice when preparing your response. In your response, you should document the specific actions taken and include any additional actions you plan to prevent recurrence. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. After reviewing your response to the Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In addition, several apparent violations were identified that are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. As described below, the apparent violations involve the series of problems identified during fuel handling operations, and control of high radiation area access including the failure to effectively control diving activities in the Unit 2 spent fuel storage pool.

The fuel handling problems included the poor material condition of the fuel handling equipment, operation of the refueling equipment contrary to the Technical Specification

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requirements, failure to use engineering drawings during troubleshooting, and the failure to follow fuel handling procedures.

On April 3, 1997, your staff failed to effectively control diving activities in the Unit 2 spent fuel storage pool and as a result, a diver moved from a comprehensively surveyed area at the south end of the pool to unsurveyed areas at the north end of the pool. The diver sustained an unplanned exposure. Although no exposure in excess of regulatory limits is believed to have occurred, we are concerned that sufficient measures were not employed to provide positive control of this activity which involved very high levels of radiation. Specifically, due to insufficient controls, including inadequate pre-job planning and communication, and lack of positive surveillance, the individual inadvertently came in close proximity to radiation fields in excess of 500 rads per hour.

During the inspection period, we also noted a failure to control access to the Unit 2 containment, a high radiation area, via the emergency airlock, and a failure to properly document the problem in the corrective action system. Additionally, on May 1, 1997, a worker performed maintenance for over one hour in a locked high radiation area inside the Unit 2 containment without any dosimetry. Subsequently, on May 4, two workers inadvertently gained access to a high radiation area during the construction of scaffolding in the Unit 2 auxiliary building. Although the last two problems occurred outside the inspection period, these issues, in conjunction with the loss of control of the diver, were considered to reflect an apparent breakdown in the applied radiation protection program, specifically the control of high radiation area access at Calvert Cliffs.

Accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

A predecisional enforcement conference to discuss these apparent violations has been scheduled for June 12, 1997 at 10:00 a.m. The decision to hold a predecisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violation sooner, corrective actions, significance of the issues and the need for lasting and effective corrective action. In particular, we expect you to address the apparent lack of effective management oversight in both fuel handling and high radiation area access control, including the May 1 and May 4 high radiation area access problems, as well as the effectiveness of your corrective action processes in identifying and correcting problems in these areas. In addition, the conference is an opportunity for you to point out any errors in our inspection report and for you to provide any information concerning your perspectives on 1) the severity of the violations, 2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and 3) any other application of the Enforcement Policy to this case, including the exercise of discretion in accordance with Section VII.

You will be advised by separate correspondence of the results of our deliberations on these matters. No response regarding these apparent violations is required at this time.

Charles H. Cruse

3

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room (PDR).

Sincerely,

Original Signed by:
Larry Nicholson for

Charles W. Hehl, Director
Division of Reactor Projects

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

Enclosures:

1. Notice of Violation
2. NRC Region I Integrated Inspection Report Nos. 50-317/97-02
 and 50-318/97-02

cc w/encls:

T. Pritchett, Director, Nuclear Regulatory Matters (CCNPP)
R. McLean, Administrator, Nuclear Evaluations
J. Walter, Engineering Division, Public Service Commission of Maryland
K. Burger, Esquire, Maryland People's Counsel
R. Ochs, Maryland Safe Energy Coalition
State of Maryland (2)

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