

APPENDIX A
NOTICE OF VIOLATION

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

As a result of the inspection conducted on January 19-29, 1988, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," (10 CFR 2, Appendix C), the violation is listed below:

Technical Specification 6.8.3.6 and Calvert Cliffs Instruction (CCI) 101J, Review and Approval Procedures for Proposed Calvert Cliffs Procedures, require that, when it is necessary to depart from approved procedure a temporary change be written into the procedure and reviewed and approved by two members of station management, one of whom must hold a senior reactor operator license on the affected unit.

Contrary to the above, (1) STP 0-5-1, Auxiliary Feedwater System, was deviated from on October 30, 1987 without temporary changes being made to the procedure. As a consequence, a valve was closed in the No. 13 Auxiliary Feedwater Pump recirculation line which had the potential for degrading the operability of the pump and, (2) several temporary changes including addition and deletion of steps were made and implemented prior to the required second review for the June 30, 1987 and September 23, 1987 performances of STP 0-65-2, Quarterly Valve Operability Verification.

This is a Severity Level IV violation (Supplement I) applicable to DPR-53 and 69.

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.

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APPENDIX B

LICENSEE STRENGTHS

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant

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As a result of the inspection conducted on January 19-29, 1988, the following strengths were identified.

1. Daily performance, experience and demonstrated knowledge of the operations staff was good. Shift inspectors had positive findings with regard to:

- Control room operations and visitor control.
- Shift turnovers and crew briefings.
- Knowledge level of Auxiliary Operators.

Control Room response to the January 22, 1988 loss of #22 instrument bus and subsequent plant trip demonstrated a well controlled, systematic and professional approach including:

- Operator system knowledge and ability to focus on problems quickly.
- Good communications.
- Excellent immediate follow-up of the trip in review of the plant status.

2. The licensee's initiative in performing a Safety System Functional Inspection (SSFI) was considered to be positive. The SSFI appears to have been well planned and systematic. BG&E personnel worked jointly with an experienced contractor to develop in-house expertise for future activities of this type. Findings with potential safety significance were promptly considered by POSRC; licensee engineers and management personnel were thoroughly briefed.
3. Completed maintenance packages contained detailed descriptions of the work accomplished. Such packages:
 - Facilitated turnover,
 - Enhanced communications,
 - Provided evidence of active QC involvement; and,
 - Provided good references for future activities.

4. Several good management practices were observed to have been completed or in progress. They included:
- Use of an opinion survey to identify potential problems.
 - Training in and implementation of team building/conflict resolution techniques.
 - Several steps taken to enhance communications.
 - Actions being taken to involve more of the staff at lower levels in collaborative decision making,
 - Accountability measures through interrelated performance objectives and performance appraisals.
 - Effective reward/recognition system.
 - Increased emphasis on plant and equipment material conditions.
 - Maintaining positive employee work ethic.

APPENDIX C

LICENSEE WEAKNESSES

Baltimore Gas and Electric Company
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As a result of the inspection conducted on January 19-29, 1988, the following weaknesses were identified.

1. Housekeeping and material condition of the plant in selected areas needed improvement:
 - There was excessive material adrift including test and equipment carts in the vicinity of safety-related buses and panels.
 - Scaffolding was erected near safety-related equipment for long periods of time. There were no designated scaffolding storage areas.
 - General housekeeping was poor in the 5 ft. elevation of the Unit 2 east penetration room and the intake structure.
 - Contaminated areas in the ECCS pump rooms inhibited access and contributed to the generation of radiological waste based on required operator access to this area several times a shift.
2. Inadequate control of troubleshooting efforts was the primary cause of the Unit 2 trip that occurred on January 22, 1988. Improvements appeared to be warranted in the following areas:
 - Troubleshooting is usually accomplished under a general Maintenance Order without a mechanism for specific control of parameters and bounds.
 - A more detailed investigation of the job per Calvert Cliffs Instruction 117 was needed prior to commencing work.
 - Conservative steps such as checking for grounds and sneak circuits were not used.
 - There were communications/interface problems with the vendor in interpreting vendor-supplied information.