

ENCLOSURE

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
EA No. 98-106

During an NRC inspection conducted from January 19, 1998 - February 17, 1998, for which exit meetings were conducted on January 27, 1998, and February 20, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 20.1501(a) requires, in part, that each licensee make or cause to be made, surveys that may be necessary to comply with the regulations in this part, and are reasonable under the circumstances to evaluate the extent of radiation levels, concentrations or quantities of radioactive material, and the potential radiological hazards that may be present.

10 CFR 20.1703(a)(3) requires, in part, that the licensee shall implement and maintain a respiratory protection program that includes air sampling sufficient to identify the potential hazard, permit proper equipment selection, and estimate exposures; and surveys and bioassays as appropriate to evaluate actual exposures.

Contrary to the above, on May 5, 1997, BG&E did not make necessary and reasonable surveys to comply with the requirements of 10 CFR 20.1703 (a)(3) and 20.1501(a) during cleaning of the Unit 2 reactor vessel flange. Specifically:

- BG&E did not evaluate the high levels of beta, gamma, and alpha contamination present, with regard to respiratory equipment selection to establish sufficient protection of workers.
- BG&E's air sampling was not sufficient to identify the potential hazard, in that air sampling was not performed in the workers' breathing zone during decontamination of the reactor flange.
- BG&E did not perform timely surveys (i.e., evaluations) of the air samples collected during decontamination of the reactor vessel flange. The air sample from the reactor flange decontamination was not evaluated for alpha airborne radioactivity until about 8 hours after the work activity was completed. When analyzed, the sample indicated approximately 103 DAC alpha, while the respiratory protective equipment selected only offered a protection factor of 50.
- The refueling floor air sample (69 foot elevation), collected during the flange cleaning, was not evaluated for alpha airborne radioactivity until about 12 hours after the work activity was completed. When analyzed, the sample indicated approximately 10.6 DAC alpha, and personnel unknowingly worked in the airborne radioactivity area without the use of respiratory protective equipment. (01013)

- B. 10 CFR 20.1902(d) requires that the licensee post airborne radioactivity areas as defined in 10 CFR 20.1003. 10 CFR 20.1003 defines an airborne radioactivity area, in part, as an area in which airborne radioactivity exists in concentrations in excess of the derived airborne concentrations (DACs) specified in 10 CFR 20, Appendix B.

Contrary to the above, on May 5, 1997, BG&E did not post the 44' elevation of the Unit 2 reactor cavity as an airborne radioactivity area when it was determined that airborne concentrations of Co-60 were about 5 times its DAC specified in Appendix B. (01023)

These violations represent a Severity Level III problem (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Baltimore Gas and Electric (Licensee) is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania
this 20th day of March, 1998