

January 30, 1989

Docket Nos. 50-317  
and 50-318

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Mr. J. A. Tiernan  
Vice President - Nuclear Energy  
Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
MD Rtes. 2 & 4  
P. O. Box 1535  
Lusby, Maryland 20657

Dear Mr. Tiernan:

SUBJECT: AMENDMENT AND QUALITY ASSURANCE PROGRAM CHANGE REGARDING  
REQUIREMENTS FOR OPERATIONS SUPERVISORS TO HOLD SENIOR  
REACTOR OPERATOR LICENSES (TACS 67956 AND 67957)

The Commission has issued the enclosed Amendment No.135 to Facility Operating License No. DPR-53 and Amendment No.116 to Facility Operating License No. DPR-69 for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your application transmitted by letter dated March 15, 1988, as modified by letter dated December 2, 1988 and supplemented by letters dated June 3, 1988 and January 13, 1989.

These amendments changed the Units 1 and 2 TS 6.2.2, "Unit Staff," by 1) modifying the requirement of TS 6.2.2.g that the General Supervisor-Nuclear Operations (GS-NO) hold a senior reactor operator (SRO) license to a new requirement that the GS-NO shall hold or shall have held an SRO license at Calvert Cliffs and 2) add a new requirement to TS 6.2.2.g to require that the Assistant General Supervisor-Nuclear Operations hold an SRO license.

In addition, this letter constitutes approval of your December 1, 1988 letter requesting reduction of your level of commitment to ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel" as provided in your Quality Assurance (QA) Program Description located in Chapter 1B, "Quality Assurance Program for the Operations Phase," of the Calvert Cliffs Nuclear Power Plant Units 1 and 2 Updated Final Safety Analysis Report and in your

QFOL

CP  
[Signature]

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PDR ADOCK 05000317  
P PDC

J. A. Tiernan

- 2 -

January 30, 1989

QA Policy. This change was necessary to modify the SRO license requirements for the GS-NO that were specified in your QA program.

A copy of the related Safety Evaluation and Notice of Issuance are also enclosed.

Sincerely,

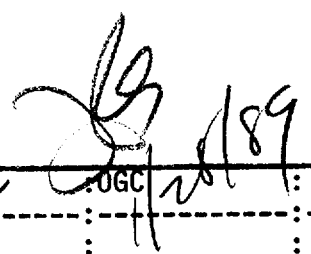


Scott Alexander McNeil, Project Manager  
Project Directorate I-1  
Division of Reactor Projects, I/II

Enclosures:

1. Amendment No. 135 to DPR-53
2. Amendment No. 116 to DPR-69
3. Safety Evaluation
4. Notice

cc: w/enclosures  
See next page



OFC : PDI-1	: PDI-1	: POEB	: PDI-1	: OGC	:	:
NAME : CVogan	: SMcNeil:vr	: RCapra	:	:	:	:
DATE : 1/26/89	: 1/26/89	: 1/27/89	: 1/30/89	: 1/ /89	:	:

OFFICIAL RECORD COPY

Mr. J. A. Tiernan  
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant

cc:

Mr. John M. Gott, President  
Calvert County Board of  
Commissioners  
Prince Frederick, Maryland 20768

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Baltimore Gas and Electric Company  
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Mr. W. J. Lippold, General Supervisor  
Technical Services Engineering  
Calvert Cliffs Nuclear Power Plant  
MD Rts 2 & 4, P. O. Box 1535  
Lusby, Maryland 20657

Resident Inspector  
c/o U.S. Nuclear Regulatory Commission  
P. O. Box 437  
Lusby, Maryland 20657

Department of Natural Resources  
Energy Administration, Power Plant  
Siting Program  
ATTN: Mr. T. Magette  
Tawes State Office Building  
Annapolis, Maryland 21204

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

BALTIMORE GAS AND ELECTRIC COMPANY

DOCKET NO. 50-317

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 135  
License No. DPR-53

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Baltimore Gas and Electric Company (the licensee) dated March 15, 1988, as modified by letter dated December 2, 1988 and supplemented by letters dated June 3, 1988 and January 13, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-53 is hereby amended to read as follows:

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PDR ADOCK 05000317  
P PDC

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 135, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Capra, Director  
Project Directorate I-1  
Division of Reactor Projects, I/II

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: January 30, 1989



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

BALTIMORE GAS AND ELECTRIC COMPANY

DOCKET NO. 50-318

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 116  
License No. DPR-69

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Baltimore Gas and Electric Company (the licensee) dated March 15, 1988, as modified by letter dated December 2, 1988 and supplemented by letters dated June 3, 1988 and January 13, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.2 of Facility Operating License No. DPR-69 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 116, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*Robert A. Capra*

Robert A. Capra, Director  
Project Directorate I-1  
Division of Reactor Projects, I/II

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: January 30, 1989

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO. 135 FACILITY OPERATING LICENSE NO. DPR-53

AMENDMENT NO. 116 FACILITY OPERATING LICENSE NO. DPR-69

DOCKET NOS. 50-317 AND 50-318

Revise Appendix A as follows:

Remove Pages

6-1\*

6-1a

Insert Pages

6-1\*

6-1a

\*Overleaf page provided for continuity purposes only.



## ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Manager - Calvert Cliffs Nuclear Power Plant shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

### 6.2 ORGANIZATION

#### 6.2.1 ONSITE & OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in FSAR Chapter 12, and updated in accordance with 10 CFR 50.71(e).
- b. The Manager - Calvert Cliffs Nuclear Power Plant shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President - Nuclear Energy shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.

## ADMINISTRATIVE CONTROLS

- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown, and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. **ALL CORE ALTERATIONS** after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A site Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew necessary for safe shutdown of both units (4 members) or any personnel required for other essential functions during a fire emergency.
- g. The General Supervisor - Nuclear Operations shall hold or have held a senior reactor operator license at Calvert Cliffs. The Assistant General Supervisor - Nuclear Operations, Shift Supervisor and Control Room Supervisor shall hold a senior reactor operator license. The Control Room Operator shall hold a reactor operator license.

## **ADMINISTRATIVE CONTROLS**

### **6.1 RESPONSIBILITY**

6.1.1 The Manager - Calvert Cliffs Nuclear Power Plant shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

### **6.2 ORGANIZATION**

#### **6.2.1 ONSITE & OFFSITE ORGANIZATIONS**

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- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in FSAR Chapter 12, and updated in accordance with 10 CFR 50.71(e).
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- c. The Vice President - Nuclear Energy shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
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## ADMINISTRATIVE CONTROLS

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- g. The General Supervisor - Nuclear Operations shall hold or have held a senior reactor operator license at Calvert Cliffs. The Assistant General Supervisor - Nuclear Operations, Shift Supervisor and Control Room Supervisor shall hold a senior reactor operator license. The Control Room Operator shall hold a reactor operator license.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 135 TO FACILITY OPERATING LICENSE NO. DPR-53  
AND AMENDMENT NO. 116 TO FACILITY OPERATING LICENSE NO. DPR-69  
BALTIMORE GAS AND ELECTRIC COMPANY  
CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-317 AND 50-318

1.0 INTRODUCTION

By the application for license amendments dated March 15, 1988, as modified by letter dated December 2, 1988 and supplemented by letters dated June 3, 1988 and January 13, 1989, the Baltimore Gas and Electric Company (BG&E; the licensee) requested the following changes to specification 6.2.2, "Unit Staff," of the Technical Specifications (TS) of the Calvert Cliffs Nuclear Power Plant, Units 1 and 2: (1) modify the current requirement of TS 6.2.2.g that the General Supervisor-Nuclear Operations (GS-NO) shall hold a senior reactor operator (SRO) license to a new requirement that the GS-NO shall hold or shall have held an SRO license at Calvert Cliffs; (2) add a new requirement to TS 6.2.2.g to require that the Assistant General Supervisor-Nuclear Operations (AGS-NO) shall hold an SRO license.

The January 13, 1989 supplement contained the commitment that BG&E shall continue to maintain an individual who holds an SRO license at Calvert Cliffs Units 1 and 2 as a member of the Plant Operations and Safety Review Committee (POSRC). This supplement did not alter the proposed TS change which was noticed in the Federal Register on December 8, 1988 (53 FR 49617). In the notice the staff did not make a proposed no significant hazards determination; rather, the requested change was published as an "Opportunity for Hearing."

In addition, on December 1, 1988, the licensee requested NRC review and approve a proposed reduction in BG&E's level of commitment to ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel" as provided in Chapter 1B, "Quality Assurance Program for the Operations Phase," of the Calvert Cliffs Nuclear Power Plant Units 1 and 2 Updated Final Safety Analysis Report (UFSAR). The licensee's Quality Assurance (QA) Program also contains the SRO license holding requirements for operations line management. Consequently, for the licensee to be permitted to make these

changes, the requested TS amendments and reductions in commitment in the QA Program must be approved.

This Safety Evaluation addresses the proposed changes to TS 6.2.2.g and to the BG&E QA Program.

## 2.0 AMENDMENT DISCUSSION AND EVALUATION

The purpose of the requested changes to the operations line management SRO license requirements of TS 6.2.2.g is to better facilitate the split of the GS-NO's duties and responsibilities between the GS-NO and the AGS-NO. Prior to the split, the GS-NO fulfilled two functions. First, he acted as an assistant to the plant manager. As such, he was involved substantially in budgeting and planning for plant modifications and maintenance, as well as supervising the entire Operations Department. And second, the GS-NO was the equivalent of an "operations manager" with responsibility for the day-to-day operation of Calvert Cliffs Units 1 and 2 by the Operations Unit. In the first role, though a good understanding of plant operations was necessary, the detailed level of knowledge required to hold an SRO license is not needed. However, in the second role, an SRO license was necessary to better ensure safe plant operations and allow the GS-NO to direct the activities of licensed operators.

During the September 1, 1988 BG&E reorganization at Calvert Cliffs, the two GS-NO roles were split with the AGS-NO assuming the function of "operations manager." Currently, the AGS-NO holds an SRO license at Calvert Cliffs and the licensee has proposed the change to TS 6.2.2.g, which requires that the AGS-NO hold an SRO license, in order to properly reflect the function of the AGS-NO in managing actual plant day-to-day operations.

At this time, the TS requires that the GS-NO must still hold an SRO license, though he no longer manages day-to-day plant operations. The licensee states that this requirement results in the GS-NO expending 21 days a year in classroom, simulator and requalification training, at a detriment to his management duties. In addition, the licensee states that this SRO requirement unduly restricts management changes involving the GS-NO position.

The proposed changes directly effect TS 6.2.2.g in an administrative manner only. Since the duties of the GS-NO were split between the GS-NO and the AGS-NO, the need for an SRO license is also split. The AGS-NO, as the "operations manager" to whom the licensed shift supervisors report directly, must maintain an SRO license to better ensure safe operation of Calvert Cliffs Units 1 and 2. This is in accordance with the intent of the guidance provided in ANSI N18.1-1971, regarding SRO license requirements for the "operations manager," to ensure that one member of the operations line

management organization would have the detailed level of knowledge of the plant required to hold an SRO license.

The GS-NO, however, no longer directly supervises day-to-day plant operations but instead performs more managerial and administrative duties pertaining to the overall Operations Department and its interface with the support organization. As such, though he must still possess a good understanding of the plant and its operation, an SRO's level of knowledge is no longer necessary. Thus, the changes proposed to TS 6.2.2.g aptly reflect the split in the previously held duties of the GS-NO and the same level of plant knowledge in the performance of these two functions as is provided by current requirements. Furthermore, the NRC staff has determined that a current SRO license is not required for the GS-NO to properly and safely perform the duties to which he is currently assigned.

However, the proposed change to the SRO license requirement of TS 6.2.2.g for the GS-NO does collaterally affect the level of knowledge, and potentially the quality of performance, of the POSRC. The POSRC functions to advise the Manager-Calvert Cliffs Nuclear Power Plant on all matters related to nuclear safety. Currently, the only required member of the POSRC, as specified in TS 6.5.1.2, "Composition," that holds an SRO license is the GS-NO. The collateral effect of the changes proposed to TS 6.2.2.g is that potentially no required member of the POSRC will hold an SRO license. Although TS do not specifically require that any POSRC member hold an SRO license, the change to the SRO license requirement of TS 6.2.2.g could adversely affect the level of knowledge of the plant and its operation that is presently inherent to the POSRC. To resolve this concern, the licensee has committed in its January 13, 1989 supplement to continue to have an individual who holds an SRO license at Calvert Cliffs Units 1 and 2 as a member of the POSRC. In addition, the licensee has committed to submitting a license amendment request to include an SRO licensed operator as a required member of the POSRC as specified in TS. 6.5.1.2, "Composition."

Consequently, the NRC staff has determined that the proposed changes to TS 6.2.2.g, adding the AGS-NO as an SRO license holder and modifying the GS-NO SRO license requirement to permit the GS-NO to have held rather than hold an SRO license at Calvert Cliffs, are acceptable.

### 3.0 OA PROGRAM CHANGE EVALUATION

The proposed change in the BG&E letter of December 1, 1988 constitutes a reduction in commitment to Section 4.2.2 of ANSI N18.1-1971 in that the individual fulfilling the position of Operations Manager specified as the GS-NO in Chapter 1B of the UFSAR will no longer be required to hold a

current SRO license. However, he will be required to hold or have held in the past an SRO license at Calvert Cliffs per the standard. To compensate for this change, the AGS-NO, who will be directly supervising the licensed operators, will be required to hold and maintain a current SRO license.

In light of the duties held by the different parties and the level of knowledge that they will be required to hold or have held, the NRC staff has determined that the proposed changes to the BG&E QA Program meet the original intent of ANSI N18.1-1971 and furthermore, that the QA Program continues to meet the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50. Consequently, these proposed changes to the QA Program are deemed acceptable.

#### 4.0 INTENT

The intent of the proposed changes to TS 6.2.2.g are to 1) add a new requirement that the AGS-NO must hold an SRO license and 2) modify the SRO license requirement of the GS-NO, to permit him to function in this capacity if he has held but does not maintain an SRO license at Calvert Cliff, without substantially affecting the level of knowledge of the plant and its operation that exists on POSRC. This POSRC level of knowledge will be ensured by requiring that the POSRC composition include a member that holds an SRO license.

#### 5.0 STATE CONSULTATIONS

The State of Maryland was consulted on this matter and had no comments on the determination.

#### 6.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32 and 51.35, and environmental assessment and finding of no significant impact was published in the Federal Register on January 30, 1989 (54 FR 4351).

Accordingly, based upon the environmental assessment, the Commission has determined that issuance of these amendments will not have a significant effect on the quality of the human environment.

#### 7.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such



activities will be conducted in compliance with the Commission's regulations and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: January 30, 1989

PRINCIPAL CONTRIBUTORS:

S. McNeil  
J. Spraul  
D. LaBarge

UNITED STATES NUCLEAR REGULATORY COMMISSION  
BALTIMORE GAS AND ELECTRIC COMPANY  
CALVERT CLIFFS NUCLEAR POWER PLANT UNIT NOS. 1 AND 2  
DOCKET NOS. 50-317 AND 50-318  
NOTICE OF ISSUANCE OF AMENDMENT TO  
FACILITY OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (Commission) has issued Amendment Nos. 135 and 116 to Facility Operating License Nos. DPR-53 and DPR-69, respectively, to the Baltimore Gas and Electric Company which revised the Technical Specifications (TS) for operation of the Calvert Cliffs Nuclear Power Plant, Units Nos. 1 and 2 located in Calvert County, Maryland.

The amendments are effective as of the date of issuance.

The amendments changed the Units 1 and 2 TS 6.2.2, "Unit Staff," by 1) modifying the requirement of TS 6.2.2.g that the General Supervisor-Nuclear Operations (GS-NO) hold a senior reactor operator (SRO) license to a new requirement that the GS-NO shall hold or shall have held an SRO license at Calvert Cliffs, and 2) add a new requirement to TS 6.2.2.g to require that the Assistant General Supervisor-Nuclear Operations hold an SRO license.

The application for the amendments complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendments.

Notice of Consideration of Issuance of Amendment and Opportunity for Hearing in connection with this action was published in the FEDERAL REGISTER on December 8, 1988 (53 FR 49617). No request for a hearing or petition for leave to intervene was filed following this notice.

The Commission has prepared an Environmental Assessment related to the action and has determined not to prepare an environmental impact statement. Based upon the environmental assessment, the Commission has concluded that the issuance of this amendment will not have a significant effect on the quality of the human environment.

For further details with respect to the action see (1) the application for amendment dated March 15, 1988, as modified by letter dated December 2, 1988 and supplemented by letters dated June 3, 1988 and January 13, 1989, (2) Amendment Nos. 135 and 116 to License Nos. DPR-53 and DPR-69, respectively, and (3) the Commission's related Safety Evaluation and Environmental Assessment. All of these items are available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, DC and at the Calvert County Library, Prince Frederick, Maryland. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Director, Division of Reactor Projects I/II.

Dated at Rockville, Maryland, this 30th day of January 1989.

FOR THE NUCLEAR REGULATORY COMMISSION



David E. LaBarge, Project Manager  
Project Directorate I-1  
Division of Reactor Projects I/II