



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

July 16, 1990

Docket Nos. 50-317
and 50-318

Mr. G. C. Creel
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
MD Rts 2 & 4
P. O. Box 1535
Lusby, Maryland 20657

Dear Mr. Creel:

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT -
SCHEDULAR EXEMPTION FOR SUBMITTAL OF FINAL SAFETY ANALYSIS REPORT
UPDATE, CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2,
TAC NOS. 76927 (UNIT 1) AND 76928 (UNIT 2)

Enclosed is a copy of an "Environmental Assessment and Finding of No Significant Impact" for your information. This assessment relates to your application dated June 8, 1990. You specifically requested a one-time schedule exemption from the requirements of 10 CFR 50.71(e) which, in part, requires licensees to submit annual revisions to their Updated Final Safety Analysis Reports (UFSAR). The Calvert Cliffs Nuclear Power Plant UFSAR, Revision 10, is currently required to be submitted by July 20, 1990. The one-time requested extension for submitting Revision 10 of the UFSAR is from July 20, 1990, to October 20, 1990, which is a three month extension.

Your request is based on internal Quality Assurance audits and NRC inspections last year which identified weaknesses in the update process used for the annual updating of the UFSAR for the Calvert Cliffs facility. Your basis for the request is that a good faith effort has been made to comply with the regulation. You further indicate that the extension of three months will substantially enhance the use, maintenance and control of the Calvert Cliffs UFSAR and overall improvement in the updating process.

9007190142 900716
PDR ADOCK 05000317
P PDC

HFOI
'11

Mr. G. C. Creel

- 2 -

The notice has been forwarded to the Office of the Federal Register for publication.

Sincerely,

ORIGINAL SIGNED BY:

Daniel G. McDonald, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure:
See next page

Distribution:

Docket File
NRC/Local PDRs
PDI-1 Reading
SVarga
RWessman
CVogan
DMcDonald
RACapra
OGC
EJordan
ACRS(10)
GPA/PA
Plant File
JLinville

PDI-1 CW
CVogan
7/10/90

[Signature]
PDI-1
DMcDonald:rsc
7/10/90

PDI-1 *[Signature]*
OGC *[Signature]*
M/Young
7/13/90

PDI-1 *[Signature]*
RACapra
7/16/90

DOCUMENT NAME: ENVIRONMENTAL ASSESS CC1/2

Mr. G. C. Creel
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant

cc:

Mr. William T. Bowen, President
Calvert County Board of
Commissioners
Prince Frederick, Maryland 20678

Mr. Joseph H. Walter
Engineering Division
Public Service Commission of Maryland
American Building
231 E. Baltimore Street
Baltimore, Maryland 21202-3486

D. A. Brune, Esq.
General Counsel
Baltimore Gas and Electric Company
P. O. Box 1475
Baltimore, Maryland 21203

Ms. Kirsten A. Burger, Esq.
Maryland People's Counsel
American Building, 9th Floor
231 E. Baltimore Street
Baltimore, Maryland 21202

Mr. Jay E. Silberg, Esq.
Shaw, Pittman, Potts and Trowbridge
2300 N Street, NW
Washington, DC 20037

Ms. Patricia Birnie
Co-Director
Maryland Safe Energy Coalition
P. O. Box 902
Columbia, Maryland 21044

Ms. G. L. Adams, Licensing
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

Mr. Richard McLean
Administrator - Radioecology
Department of Natural Resources
580 Taylor Avenue
Tawes State Office Building
PPER 83
Annapolis, Maryland 21401

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

UNITED STATES NUCLEAR REGULATORY COMMISSION
BALTIMORE GAS AND ELECTRIC COMPANY
DOCKET NOS. 50-217 AND 50-218
ENVIRONMENTAL ASSESSMENT AND FINDING OF
NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from certain requirements of 10 CFR Part 50.71, "Maintenance of records, making of reports," subsection (e), to the Baltimore Gas and Electric Company (BG&E/licensee) for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2, located at the licensee's site in Calvert County, Maryland.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action:

The licensee would be exempted from the requirements of 10 CFR 50.71, subsection (e)(4), to the extent that a one-time extension for submitting Revision 10 of the UFSAR would be granted from the currently required annual submittal date of July 20, 1990, to October 20, 1990, which is a three month extension. All future UFSAR updates will be submitted on an annual basis by the required July 20 date.

The Need for the Proposed Action:

Internal Quality Assurance audits and NRC inspections conducted in 1989 identified weaknesses in the licensee's updating process for the annual update of the UFSAR. Weaknesses were noted in the methods for identifying modifications which required updating and failure to incorporate safety evaluation reports, Generic Letters, and other material as described in 10 CFR 50.71(e).

9007190144 900716
PDR ADOCK 05000317
F PIC

The licensee's subsequently initiated an investigation to determine the cause of the lack of adequate administrative controls for the updating process. The lack of central oversight and adequate administrative procedures resulted in relying on individuals being responsible, thus, many required items were not included in the periodic updates of the UFSAR as required by the regulations.

The licensee has initiated corrective actions for the identified weaknesses which include centralized control utilizing an experienced consultant on a full time basis for the short-term and has increased its supervisory involvement in the updating process.

It was determined that the Revision 10 update to the UFSAR would require additional interface with the responsible design engineers to ensure both completeness and quality of the updates to be incorporated.

The schedule extension is needed in the short-term, for the reasons discussed above, to assure adequate time is available to allow the licensee to provide a complete and quality update. The extended time also allows the long-term effort to improve the update process, which is being pursued in parallel, to achieve the benefits of the lessons learned in the current update effort. Both the short-term and long-term effort are being handled primarily by the same individuals.

Environmental Impact of the Proposed Action:

The proposed exemption constitutes a three month delay in the annual update of the UFSAR. The requested exemption is a temporary one and is necessary to assure both improvement in the completeness and quality of the Revision 10 update and future update submittals. The additional time also allows the feedback necessary to assure the final procedures used for future submittals are workable, efficient and will result in quality submittals.

The licensee has made a good faith effort to comply with the regulations by initiating corrective actions, both short-term and long-term, to improve its submittals when the deficiencies were identified by both its internal process and the NRC inspection process. Therefore, the exemption would only provide temporary relief from the applicable regulation and the extension would allow time for an improved update both for Revision 10 and future annual updates.

The proposed exemption will not change plant equipment, operation or procedures, and does not adversely affect either the probability or the consequences of any accident at this facility. The exemption does not affect radiological effluents from the facility or radiation levels at the facility. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed exemption.

The proposed exemption does not affect nonradiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed exemption.

Alternative to the Proposed Action:

Since the Commission has concluded there are no measurable environmental impacts associated with the proposed exemptions, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to the exemptions would be to require rigid compliance with the schedular requirements of 10 CFR 50.71(e)(4) for the USFSAR update. Such action would not enhance the protection of the environment and could result in an unsatisfactory update lacking all the required information specified in the regulation.

Alternative Use of Resources

This action involves no use of resources not previously considered in the Final Environmental Statement for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2.

Finding of No Significant Impact

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, the staff concludes that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this proposed action, see the licensee letter dated June 8, 1990. This letter is available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C., and at the Calvert County Library, Prince Frederick, Maryland.

Dated in Rockville, Maryland, this 16th day of July 1990.

FOR THE NUCLEAR REGULATORY COMMISSION



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