

Reduction of Unnecessary Regulatory Burden Initiative

Offsite Review Committee

ANSI N18.7-1976/ANS 3.2, Sec 4.3

Independent Review Program

- Options allowed
 - Standing Committees Functioning as Independent Review Bodies
(The majority of nuclear power plants.)
 - Organizational Units Functioning as Independent Review bodies
(A number of conversions to this option recently.)

Calvert Cliffs Nuclear Power Plant

- Uses the first option:
 - Off-site Safety Review Committee (OSSRC)
- OSSRC members are appointed by the Chief Nuclear Officer from within the company and external organization

Subjects Requiring Independent Review (Sect 4.3.4)

- Written safety evaluations of changes in the facility as described in the SAR
- Proposed changes in procedures or proposed tests or experiments
- Changes to T/S or License amendments prior to implementation
- Violation, deviations and reportable events
- Any other matter involving nuclear safety

ANSI N18.7-1976/ANS 3.2

Definition of Independent Review

- “... review completed by personnel not having direct responsibility for the work function under review regardless of whether they operate as part of an organizational unit or as individual staff members ...”

Justification for Elimination of Independent Review Body

ANSI N18.7-1976/ANS 3.2, Sec 4.4
**“Review Activities of Onsite
Operating Organization”**

- Monitor operating activities to assist plant manager
- Screen subjects of potential concern to independent reviewers

Calvert Cliffs Plant Operation and Safety Review Committee (POSRC)

- Reviews all subjects requiring independent review
- The review process meets the definition of independent review
- Membership composition and qualification meets the ANS 3.2 requirement
- Commitment for record keeping meets ANS 3.2 requirement
- As part of the proposed elimination of the OSSRC, we would commit to expand the authority of the chairman of POSRC to consult with experts as he sees fit

Other Reviews

- All conditions adverse to quality receive independent review by the Issue Assessment Unit
- 10 CFR 50.59 Safety Evaluations and License Amendment Requests receive multidisciplinary review
- INPO Plant Evaluation process meets the programmatic oversight requirement of the Standard

CONCLUSION

- Elimination of the regulatory requirement for an OSSRC does not reduce the effectiveness of the CCNPP QAP and does not affect continued compliance with 10 CFR 50, Appendix B

PROPOSED
MARKED-UP PAGES FOR
THE REDUCTION IN
QUALITY ASSURANCE
COMMITMENT

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Corporate Organization and Specific Responsibilities

The Corporate Organization Chart of Constellation Generation Group-Calvert Cliffs Nuclear Power Plant is shown in Figure 1B-1. Persons responsible for the principal elements of the Company's Quality Assurance (QA) Program are as follows: (1)

- President -Constellation Generation Group (CGG)
- Senior Vice President – Constellation Generation Group – Technical Services (TS)
- Vice President – Constellation Generation Group – Business Services (BS)
- Vice President - Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP)
- Senior Manager – Engineering Services
- Plant General Manager-Calvert Cliffs Nuclear Power Plant Department (CCNPPD)
- Manager – Nuclear Operations Department (NOD)
- Manager-Nuclear Maintenance Department (NMD)
- Manager – Integrated Work Management Department (IWMD)
- Manager-Quality and Performance Assessment Department (QPAD)
- Manager – CCNPP Engineering Services
- Manager-Procurement & Warehouse Services (PWSD)
- Manager – Security/Emergency Preparedness
- Manager – CGG Information Technology
- Director – Nuclear Training
- Director – Licensing and Compliance
- Director – Nuclear Fuel Services
- Director – Project Management

The management team listed above is committed to the successful implementation of the Calvert Cliffs QA Program.

Reporting to the above Vice Presidents/Managers/Directors are Directors, General Supervisors and Unit Supervisors.

Vendors, contractors, or non-CCNPP personnel performing any maintenance/modification activities at CCNPP are responsible for performing these activities in accordance with applicable QA Program requirements. This can be accomplished by either developing their own QA Program procedures or by working to the QA Program through appropriate CCNPP personnel using CCNPP approved procedures. (15)

~~Two advisory groups perform quality related functions for plant operations. These are the Plant Operations and Safety Review Committee (POSRC) and the Off-Site Safety Review Committee (OSSRC) whose makeup and responsibilities are described in Addendum 1B-1. (19)~~

The advisory group, Plant Operations and Safety Review Committee (POSRC), performs quality-related functions for plant operations. Its

~~2. The OSSRC provides independent verification by review that CCNPP is operated in accordance with established requirements. The OSSRC, which functions under a written Charter approved by the President-CGG (Chief Nuclear Officer), is composed of on-site and off-site personnel knowledgeable of in-plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, radiological safety, instrumentation and control systems, mechanical and electrical systems, quality assurance, and environmental factors. The proceedings of all meetings are documented and sent to the President-CGG (Chief Nuclear Officer) Committee members, and others designated by the Committee Chairman.~~



The on-site POSRC reviews matters pertaining to nuclear plant safety. ~~This Committee screens subjects of potential concern to the OSSRC and performs preliminary investigations~~ under the direction of the Plant General Manager. POSRC membership and functions are governed by Addendum 1B-1 and written procedures. (19) The results of all meetings are documented and sent to the ~~members of the OSSRC, and others designated by the Committee Chairman.~~

President-CGG (Chief Nuclear Officer)

The maintenance and repair of systems, structures, and components subject to the QA Program are performed by personnel under the direction of the General Supervisors of Electrical & Controls Maintenance Health Physics, Mechanical Maintenance, Integrated Maintenance, Maintenance Services, Scheduling and Outage Management, and Planning and Document Management, according to written procedures and instructions prepared and approved as stated in QA Program documents. These procedures:

1. Ensure that quality-related activities, such as inspections and tests, are performed with appropriate equipment and under suitable environmental conditions.
2. Indicate inspections and checks that must be made and records and data that must be kept.
3. Show where independent verifications of inspections or checks should be performed by specified personnel other than those performing the work.

When necessary, non-plant Company personnel or outside contractors are brought in to supplement the plant work force. In such instances, the approval of work procedures and the tagging of equipment are coordinated by a member of the CCNPP organization responsible for the performance of the work.

Controls are established in QA Program documents to ensure that materials and parts used in the repair, maintenance, and modification of SR and designated NSR portions of the plant are appropriate for the service intended. Written procedures are prepared for the storage and identification of materials and parts to ensure that they do not deteriorate in storage and can be correctly identified before installation or use.

Equipment manufacturers and contractors used for the repair, maintenance, and modification of SR and designated NSR structures, systems, and components are required to have quality assurance programs consistent with the importance of the end-product to safety.

1B.17 QUALITY ASSURANCE RECORDS

Controls have been established to ensure that quality assurance records are maintained to provide documentary evidence of the quality of SR and designated NSR items and activities. Applicable design specifications, procurement documents, test procedures, operational procedures, Technical Specifications, and other documents specify records that should be generated, supplied, or maintained by and for CCNPP.

Quality assurance records are classified as lifetime or non-permanent.

Lifetime records, maintained for particular items for the life of CCNPP, for particular items have significant value in relation to demonstrating capability for safe operation; maintaining, reworking, repairing, replacing, or modifying an item; determining the cause of an accident or malfunction of an item; and providing required baseline data for in-service inspection.

The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components identified in Design Authority Program procedures.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to the Technical Specifications.
- i. Records of Quality Assurance activities identified in this NRC approved QA Policy as lifetime records.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the POSRC, ^{and} the Procedure Review Committee, ~~and the OSSRC.~~
- l. Records of the service lives of all safety related snubbers including the date at which the service life commences and associated installation and maintenance records.

Non-permanent records, which show evidence that a SR and designated NSR activity was performed in accordance with applicable requirements, are retained for periods sufficient to ensure CCNPP's ability to reconstruct significant events and to satisfy applicable regulatory requirements. Retention periods are based on requirements specified in QA Program documents. Retention periods shall be documented.

1B.18 AUDITS

Internal audits are performed by CCNPP's QPAD to ensure that activities and procedures established to implement the requirements of 10 CFR 50, Appendix B, comply with CCNPP's overall QA Program. These audits ~~are performed under the cognizance of the OSSRC and~~ provide a comprehensive independent verification and evaluation of quality-related activities and procedures. Audits ensure the effective and proper implementation of CCNPP's QA Program. Audits of selected aspects of operational phase activities are performed with a frequency commensurate with their strength of performance and safety significance and in such a manner as to assure that an audit of all safety-related functions is completed within a period of two years. Audits and assessments may be conducted continuously (Audits specified in regulations are performed at the frequencies noted therein.) In addition to the audit subjects specified in Regulatory Guide 1.33 Revision 2 and ANSI N18.7-1976/ANS-3.2, audits performed within a period of two years shall also encompass: the Facility Fire Protection program and implementing procedures; an independent fire protection and loss prevention program inspection and audit utilizing either qualified offsite licensee personnel or an outside fire protection firm; the radiological environmental monitoring program and the results thereof; the Offsite Dose Calculation Manual and implementing procedures; the Process Control Program and implementing procedures for processing and packaging of radioactive wastes; the performance of activities required by the QA Program for effluent and environmental monitoring; and the performance of activities required by the QA Program to meet the criteria of 10 CFR 50, Appendix B. Audits shall also encompass any other area of facility operation considered appropriate by ~~the OSSRC or~~ the Vice President -CCNPP. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months. (19)

Vendor audits are performed to evaluate QA programs, procedures, and activities. Audits of major vendors are made early enough to ensure compliance with all aspects of CCNPP's procurement documents. Additional audits are performed as required to ensure that all requirements of CCNPP's QA Program are properly implemented according to procurement documents.

Audits are performed in accordance with pre-established written procedures or checklists by qualified QPAD personnel who have no direct responsibility for the work being audited. Technical specialists from other CCNPP departments and outside consultants may assist as necessary in performing audits. Audits include objective evaluation of quality-related practices, procedures, instructions, activities, and items, as well as review of documents and records.

Reports of audits are analyzed and documented. Results that indicate the QA Program to be inadequate, ineffective, or improperly implemented, including the need for re-audit of deficient areas, are reported to the Manager and Supervisor of the audited activity. Controls have been established for verifying that corrective action is taken promptly to correct noted deficiencies.

To ensure that CCNPP's QPAD complies with the requirements of CCNPP's QA Program, an independent management audit of QPAD activities is performed annually by a Joint Utility Management Audit (JUMA) Team.

ADDENDUM 1B-1 (19)

AND

REVIEW FUNCTIONS OF THE POSRC, PROCEDURE REVIEW COMMITTEE, QUALIFIED REVIEWERS, AND OSSRC

1.0 PLANT OPERATIONS AND SAFETY REVIEW COMMITTEE (POSRC)

1.1 FUNCTION

The POSRC shall function to advise the Plant General Manager on all matters related to nuclear safety.

1.2 COMPOSITION

The POSRC shall be composed of at least seven members, including the Chairman. Members shall collectively have experience in the following areas:

- Nuclear Operations
- Electrical and Controls Maintenance
- Chemistry
- Mechanical Maintenance
- Nuclear Engineering
- Radiation Safety
- Plant Engineering
- Design Engineering

Members shall be appointed in writing by the Plant General Manager. Members shall have a minimum of eight years power plant experience of which a minimum of three years shall be nuclear power experience. At least one member shall have a SRO license on Calvert Cliffs Units 1 and 2.

Consultants shall be utilized as determined by POSRC chairman to provide expert advice.

1.3 CHAIRMAN

The Chairman and alternate Chairmen of the POSRC shall be appointed in writing by the Plant General Manager. Chairmen shall have a minimum of 10 years power plant experience of which a minimum of three years shall be nuclear power experience.

1.4 ALTERNATES

All alternate members shall be appointed in writing by the Plant General Manager. Alternate members shall have a minimum of eight years power plant experience of which a minimum of three years shall be nuclear power experience.

1.5 MEETING FREQUENCY

The POSRC shall meet at least once per calendar month and as convened by the POSRC Chairman or one of the designated alternates.

1.6 QUORUM

A quorum of the POSRC shall include the Chairman or one of the designated alternate chairmen and shall consist of a majority of the members, including alternates. No more than half of the quorum shall be alternates, including an alternate chairman.

1.7 RESPONSIBILITIES

The POSRC shall be responsible for the following except for those items designated for review by the Procedure Review Committee or Qualified Reviewer in accordance with Addendum sections 2 and 3, respectively:

- a. Review of 1) all procedures required by Technical Specifications 5.4 and changes thereto, and 2) any other proposed procedures or changes thereto as determined by the Plant General Manager to affect nuclear safety. *

Cross-disciplinary reviews of these procedures are conducted in accordance with administrative procedures in addition to the reviews conducted by POSRC, the Procedure Review Committee, or Qualified Reviewer.

- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix A, Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the ~~Off Site Safety Review Committee~~.
- f. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the ~~Off Site Safety Review Committee~~.
- g. Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.
- h. Review of all 10 CFR 50.59 and 10 CFR 72.48 Evaluations that support procedures in 1.7.a and changes or modifications in 1.7.d above.
- i. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Plant General Manager, the Vice President - CCNPP and ~~to the Chairman of the Off Site Safety Review Committee~~. *and*
- j. Review of all Reportable Events. The results of this review shall be submitted to the ~~OSSRC~~ and the Vice President -CCNPP.
- k. Review of facility operations to detect potential safety hazards.
- l. Review of any accidental, unplanned or uncontrolled radioactive release that exceeds 25% of the limits of Offsite Dose Calculation Manual (ODCM) 3.11.1.2, 3.11.2.2 or 3.11.2.3, including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and for forwarding of these reports to the Plant General Manager and the ~~Off Site Safety Review Committee~~.

*Vice President - CCNPP
and to the President CAG
Chief Nuclear Officer*

* POSRC is only required to review Fire Protection procedures and changes thereto which affect nuclear safety.



~~m. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Off Site Safety Review Committee.~~

~~l.~~ Review of Safety Limit Violation Reports.

1.8 AUTHORITY

The Plant Operations and Safety Review Committee shall:

- a. Recommend to the approval authority approval or disapproval of procedures considered under 1.7.a above.
- b. Recommend to the Plant General Manager approval or disapproval of items considered under 1.7.b through h above.
- c. Render determinations in writing with regard to whether or not each item considered under 1.7.a through h requires prior NRC approval.
- d. Evaluate root causes and recommended actions to prevent recurrence for items considered under 1.7.i through l above.
- e. Provide written notification within 24 hours to the Vice President - CCNPP ~~and the Chairman of the Off Site Safety Review Committee~~ of disagreement between the POSRC and the responsible approval authority in the case of item 1.7.a above or between the POSRC and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to ITS 5.1.1.

1.9 RECORDS

The POSRC shall maintain written minutes of each meeting and copies shall be provided to the Vice President - CCNPP, ~~Chairman of the Off Site Safety Review Committee~~, and the Plant General Manager.

2.0 PROCEDURE REVIEW COMMITTEE

2.1 FUNCTION

The Procedure Review Committee may function to review items listed in 1.7.a above in lieu of review by POSRC or Qualified Reviewer as directed by the Plant General Manager.

2.2 COMPOSITION

The Procedure Review Committee shall be composed of a Chairman and eight individuals who shall collectively have expertise in the areas contained in 1.2 above.

Members shall be appointed in writing by the Plant General Manager. Members shall have a minimum of eight years power plant experience of which a minimum of three years shall be nuclear power experience. At least one member shall be a POSRC member or alternate. The charter for the Procedure Review Committee shall include a description of membership, qualifications, functions, and reports and shall be described in plant administrative procedures. The Procedure Review Committee may be dissolved at the discretion of the Plant General Manager.

2.3 CHAIRMAN

The Chairman and alternate Chairmen of the Procedure Review Committee shall be appointed in writing by the Plant General Manager. Chairmen shall have a minimum of eight years power plant experience of which a minimum of three years shall be nuclear power experience.

2.4 ALTERNATES

All alternate members shall be appointed in writing by the Plant General Manager. Alternate members shall have a minimum of eight years power plant experience of which a minimum of three years shall be nuclear power experience.

2.5 MEETING FREQUENCY

The Procedure Review Committee shall meet at least once per calendar month and as convened by the Chairman or his designated alternates.

2.6 QUORUM

A quorum for the Procedure Review Committee shall consist of the Chairman or one of the designated alternate Chairmen and three primary or alternate members provided at least four disciplines are represented.

2.7 AUTHORITY

The Procedure Review Committee shall:

- a. Recommend to the Approval Authority approval or disapproval of procedures considered under 1.7.a above.
- b. Render determinations in writing with regard to whether or not each procedure under 1.7.a above requires prior NRC approval.
- c. Provide written notification within 24 hours to the Vice President - CCNPP and the ~~Chairman of the Off-Site Safety Review Committee~~ of disagreements between the Procedure Review Committee and the responsible approval authority. The Plant General Manager shall have responsibility for resolution of such disagreements pursuant to ITS 5.1.1.

2.8 RECORDS

The Procedure Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Plant General Manager.

3.0 QUALIFIED REVIEWERS

3.1 FUNCTION

The Plant General Manager may designate specific procedures or classes of procedures described in 1.7.a above to be reviewed by Qualified Reviewers in lieu of review by POSRC or the Procedure Review Committee.

3.2 AUTHORITY

Qualified Reviewers shall:

- a. Recommend to the approval authority approval or disapproval of designated procedures and changes considered under 1.7.a above and
- b. Render determination in writing with regard to whether or not each procedure under 1.7.a above requires prior NRC approval.
- c. Provide written notification within 24 hours to the Vice President - CCNPP and the Chairman of the Off Site Safety Review Committee of disagreements between the Qualified Reviewer and the approval authority. The Plant General Manager shall have responsibility for resolution of such disagreements pursuant to ITS 5.1.1.

3.3 CERTIFICATION

Qualified Reviewers shall be nominated, trained, and certified in accordance with administrative procedures. Certification shall be by a department manager.

3.4 CERTIFICATION REQUIREMENTS

Certification requirements of personnel designated as Qualified Reviewers shall be in accordance with administrative procedures.

Qualified Reviewers shall have:

- a. A Bachelor's degree in engineering, related science, or technical discipline, and two years of nuclear power plant experience;

OR

- b. Six years nuclear power plant experience

OR

- c. Equivalent combination of education and experience as approved by a Department Manager/Director.

3.5 RECORDS

Review of procedures by Qualified Reviewers shall be documented in accordance with administrative procedures.

~~4.0 OFF-SITE SAFETY REVIEW COMMITTEE (OSSRC)~~

~~4.1 FUNCTION~~

~~The Off-Site Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:~~

- ~~a. nuclear power plant operations~~

- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy and non-destructive examination
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

4.2 COMPOSITION

The Off-Site Safety Review Committee shall be composed of at least seven members, including the Chairman. Members of the Off-Site Safety Review Committee may be from CCNPP or organizations external to CCNPP and shall collectively have expertise in all of the areas of 4.1 above.

4.3 QUALIFICATIONS

The Chairman, members and alternate members of the Off-Site Safety Review Committee shall be appointed in writing by the President - CCG (Chief Nuclear Officer) and shall have an academic degree in engineering or a physical science, or the equivalent, and in addition shall have a minimum of five years technical experience in one or more areas given in 4.1 above. No more than two alternates shall participate as voting members in Off-Site Safety Review Committee activities at any one time.

4.4 CONSULTANTS

Consultants shall be utilized as determined by the Off-Site Safety Review Committee Chairman to provide expert advice to the Off-Site Safety Review Committee.

4.5 MEETING FREQUENCY

The Off-Site Safety Review Committee shall meet at least once per six months.

4.6 QUORUM

The quorum of the Off-Site Safety Review Committee necessary for the performance of the Off-Site Safety Review Committee review and audit functions shall consist of more than half the Off-Site Safety Review Committee membership or at least four members, whichever is greater. This quorum shall include the Chairman or his appointed alternate and the Off-Site Safety Review Committee members, including appointed alternates, meeting the requirements of 4.3 above. No more than a minority of the quorum shall have line responsibility for operation of the plant.

4.7 SUBCOMMITTEES

The Chairman may establish subcommittees to perform reviews of selected items enumerated in 4.8 and 4.9 below. Each subcommittee shall be chartered in writing, have at least three members/alternates, and provide reports to the full committee on the results of its reviews with any appropriate recommendations.

4.8 REVIEW

The Off-Site Safety Review Committee shall review:

- a. The 10 CFR 50.59 and 10 CFR 72.48 evaluations for changes to the facility or procedures and conducting tests or experiments completed under the provisions of 10 CFR 50.59 and 10 CFR 72.48 to verify that such actions did not require prior NRC approval.
- b. Proposed changes in Technical Specifications of the Operating License.
- c. Violation of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- d. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- e. All Reportable Events.
- f. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- g. Reports and meetings minutes of the POSRC.

4.9 AUDITS

Audits of facility activities shall be performed under the cognizance of the Off-Site Safety Review Committee. These internal audits are discussed in Section 1B.18 of the QA Policy.

4.10 AUTHORITY

The OSSRC reports to the President-CGG (Chief Nuclear Officer). This includes direct access to the CNO for any nuclear safety issues.

Oversight of OSSRC activities is delegated to the Senior Vice President-CGG TS. The Senior Vice President-CGG TS will receive reports and meeting minutes sent to the CNO and can provide direction to the OSSRC Chairman regarding specific areas for review. Additionally, the OSSRC Chairman will periodically brief the Senior VP regarding OSSRC activities and issues. The Senior Vice President will report any Nuclear Safety issues identified by the OSSRC to the Chief Nuclear Officer.

4.11 RECORDS

Records of Off-Site Safety Review Committee activities shall be prepared, approved and distributed as indicated below:

-
- ~~a. Minutes of each Off-Site Safety Review Committee meeting shall be prepared, approved and forwarded to the President - CGG (Chief Nuclear Officer) within 14 days following each meeting.~~
 - ~~b. Reports of reviews encompassed by 4.8 above, shall be prepared, approved and forwarded to the President-CGG (Chief Nuclear Officer) within 14 days following completion of the review.~~
 - ~~c. Audit reports encompassed by 4.9 above, shall be forwarded to the President- CGG (Chief Nuclear Officer) and to the management positions responsible for the areas audited within 30 days after completion of the audit.~~