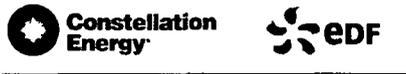


# CENG

a joint venture of



CALVERT CLIFFS  
NUCLEAR POWER PLANT

March 2, 2011

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**ATTENTION:** Document Control Desk

**SUBJECT:** Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Response to Safety Evaluation Re: Calvert Cliffs Submittal of Snubber Program  
Relief Request (RR-SNUB-1) (TAC Nos. ME4892 and ME4893)

**REFERENCES:**

- (a) Letter from Mr. J. J. Stanley (CCNPP) to Document Control Desk (NRC), dated October 11, 2010, Submittal of Snubber Program Relief Request (RR-SNUB-1)
- (b) Letter from Ms. N. L. Salgado (NRC) to Mr. G. H. Gellrich (CCNPP), dated February 8, 2011, Snubber Program Relief Request RR-SNUB-1 – Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (TAC Nos. ME4892 and ME4893)
- (c) Letter from Mr. J. J. Stanley (CCNPP) to Document Control Desk (NRC), dated December 15, 2010, Response to Request for Additional Information – Submittal of Snubber Program Relief Request (RR-SNUB-1) Submittal of Snubber Program Relief Request (RR-SNUB-1) (TAC Nos. ME4892 and ME4893)

In Reference (a), Calvert Cliffs Nuclear Power Plant, LLC (Calvert Cliffs), submitted Relief Request RR-SNUB-1, pertaining to the examination and testing of snubbers at Calvert Cliffs. During our review of Nuclear Regulatory Commission's (NRCs) Safety Evaluation [Reference (b)] for Calvert Cliffs RR-SNUB-1, an apparent discrepancy in the Safety Evaluation was found in the description of the personnel qualifications for personnel performing certain snubber inservice examinations. Specifically, in Reference (b), in the table within Section 3.2 on Inservice Examination, Item 3, "Method of Visual Examination," it is stated "The licensee states in their relief request that examinations shall be performed using VT-3 visual examination certified personnel." In addition, in the last sentence in Section 3.1.4 of Reference (b), the Safety Evaluation states "While the schedule of examinations is to be determined from

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NRC

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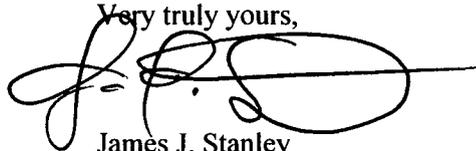
the Calvert Cliffs TRM, the examinations are still to be performed using VT-3 visual examination certified personnel.” These statements do not reflect actual plant practice.

In References (a) and (c) we described that the IWF-5300(a)-required inservice examinations are conducted using the examination method described in IWA-2213. No information was provided about the qualifications of the personnel conducting the examination. Personnel involved in the conduct of IWF-5300(a) examinations follow the IWA-2213 methodology; however, they are not VT-3 certified. These examinations are performed using task qualified personnel who are knowledgeable in the examinations and who are experienced with snubber operation and maintenance. It is important to note that the IWF-5300 examinations do not involve any repair/replacement activity.

IWF-5200(a) (Preservice Exams and Testing) is applicable to the installation of new snubbers, or snubbers which have undergone a repair/replacement activity described in IWA-4000. These snubbers would have a VT-3 examination and would be tested per IWF-5200(b). These IWF-5200(a) exams are performed by VT-3 visual examination certified personnel since they involve a repair/replacement activity.

Should you have questions regarding this matter, please contact Mr. Douglas E. Lauver at (410) 495-5219.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Stanley', with a long horizontal line extending to the right.

James J. Stanley

Manager-Engineering Services

JJS/KLG/bjd

cc: D. V. Pickett, NRC  
W. M. Dean, NRC

Resident Inspector, NRC  
S. Gray, DNR