BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

December 14, 1979

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Mr. Darrel G. Eisenhut, Acting Director
Division of Operating Reactors

Subject: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2, Docket Nos. 50-317 & 50-318
Follow-up Actions Resulting from TMI-2
Incident (Lessons Learned)

References: (a) A. E. Lundvall, Jr. letter of October 19, 1979, to D. G. Eisenhut, same subject

(b) A. E. Lundvall, Jr. letter of November 20, 1979, to D. G. Eisenhut, same subject

Gentlemen:

As the result of a meeting in your offices on December 13, 1979, between your Mr. E. L. Conner, Jr. and Mr. C. Nelson and our Mr. R. E. Denton, we became aware that you find portions of our proposed plans to implement the requirements of the subject report to be unacceptable. Specifically, our plans to utilize one of our present on-shift Senior Operator License (SOL) holders to perform a dedicated accident assessment function for either of our units which may be affected by an accident situation have found by your staff to be inadequate. The major concern expressed at the meeting centered on the staffing level of the "unaffected" unit, in that our proposal would dedicate both of the SOL holders on shift to the unit affected by an accident. It is therefore postulated by your staff that either the accident "command and control" function performed by the Shift Supervisor or the "accident assessment" function performed by the Senior Control Room Operator (SCRO) may be diluted by a need to monitor the unaffected unit. Since our proposal, set forth in detail by references (1) and (2), provides for two Operator License (OL) holders to be available to the controls of the unaffected unit, we do not share the concern of your staff that an immediate need for an SOL holder to monitor the non-accident unit would exist. We believe that until the personnel augmentation provided

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for by the Site Emergency Plan occurs, the unit would be adequately controlled and monitored by the available OL holders, or that satisfactory provisions could be made for a standby SOL holder to be called in. Such alternatives were discussed and deemed by your staff not to be in concert with your position on this subject. Therefore, in order to provide the capability to dedicate two SOL holders to the affected unit and concurrently provide an SOL holder to monitor the non-accident unit, we plan to add a third SOL holder to each of our normal shifts. To do so will require upgrading approximately three of our present OL holders to an SOL level. Such upgrading will naturally involve some additional training and the required NRC-administrated examination. Until these additional personnel are available, commencing on January 31, 1980, we plan to provide coverage for the accident assessment function described by references (1) and (2) as follows:

(1) When both units are in an operational mode other than Cold Shutdown or Refueling (Modes 5 and 6), each shift will be staffed by at least three SOL holders or a minimum of two SOL holders and a person with a B.S. degree in Engineering or the physical sciences.

(2) When one or both units is in Cold Shutdown or Refueling, a minimum of two SOL holders (per the requirements of our plant Technical Specifications) will be provided on each shift.

We believe the above commitment satisfies your requirements; should you have further questions on this matter, we would be pleased to discuss them with you.

Very truly yours,

A. E. Lundvall, Jr.
Vice President-Supply

AEL/gla

cc: Mr. C. Nelson, USNRC
Mr. E. L. Conner, Jr., USNRC
Mr. J. A. Biddison, Esquire
Mr. G. F. Trowbridge, Esquire

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