

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

DEC 08 1975

E. J. Brunner, Chief, Reactor Operations
Branch, IE:1

THRU: *J. H. Sniezek*
J. H. Sniezek, Chief, Light Water Reactor
Programs Branch, IE

BALTIMORE GAS AND ELECTRIC CO., CALVERT CLIFFS 1 (AITS FL4192H1)

The subject memorandum identified three items for Headquarters consideration. A brief indication of the status of these items and some general comments relating to the inspection findings, Report No. 50-317/75-23, are as follows:

Item 1: Memorandum dated 12/8/75, J. H. Sniezek to D. L. Ziemann recommending proposed Technical Specification change.

Item 2: Interim Definition of Safety-Related. Because of the differences in design, the items identified may differ for each specific facility; however, a general definition is as follows:

Those plant features, and functions affecting those plant features, which:

1. will be relied upon for safe shutdown and cooldown of the reactor under normal plant conditions and for maintaining the reactor in a safe condition for an extended shutdown period, or
2. will be relied upon for safe shutdown and cooldown of the reactor under faulted, upset, or emergency conditions, and for maintaining the reactor in a safe condition for an extended shutdown period, or
3. will be relied upon for establishing conformance with safety limits or limiting conditions for operation that are included in the facility technical specifications, or
4. are classified as engineered safety features or will be relied upon to support or assure the operations of engineered safety features within design limits, or
5. are assumed to function or for which credit is taken in the accident analysis for the facility (as described in the Final Safety Analysis Report), or
6. will be utilized to process, store, control, or limit the release of radioactivity.

8005290294 Q

POOR ORIGINAL

E. J. Brunner

- 2 -

DEC 08 1975

Item 3: This item was incorporated in our comments on the proposed Regulatory Guide, "Nuclear Power Plant Structures, Systems, Components and Activities Subject to Quality Assurance Program."

A review of the Inspection Report No. 50-317/75-23 revealed that a citation was issued to the licensee because reactor coolant, borated water, and diesel fuel were excluded from the QA Program. Information discussed in the report indicated that these items were not specifically identified on the "Q" List of Safety-Related Items which had been reviewed (approved) by the "Q" List Committee. In addition, information discussed in the FSAR, Section 1.c., Quality Assurance Program for the Operations Phase, does not identify the specific items that should be on the "Q" List; however, we note that the facility Technical Specifications establish specific surveillance requirements for the three items identified above.

Based on the foregoing, it appears that IE employed a ratcheting technique by citing the licensee for failure to include specific items on the "Q" List, in that the items were not identified in the Reactor Licensing reviewed QA Program documented in the FSAR. It appears that a more appropriate course of action would have been to identify for appropriate review by RL those safety-related items which were not covered adequately in the FSAR or TS. We note that the fuel oil deficiency was handled in this manner.

If you require additional information or wish to discuss this matter further, please contact me.

F. J. Nolan
F. J. Nolan, Senior Reactor
Inspection Specialist
Light Water Reactor Programs
Branch, IE

cc: H. D. Thoraburg, IE
G. W. Roy, IE

POOR ORIGINAL