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Tidewater Administration

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October 26, 1989

James T. Wiggins, Chief
Reactor Projects Branch No. 1
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Jim:

In light of the upcoming meeting with Baltimore Gas and Electric to discuss their readiness to restart Calvert Cliffs, I have several questions regarding the NRC's review process for assessing readiness. Normally, the NRC has required licensees of problem plants to follow a certain sequence of events prior to restart. Generally, for licensees to demonstrate readiness to restart a plant in Calvert Cliffs' position, several steps would need to be taken: identify the problem and the root causes of the problem, develop a plan with specific tasks to be accomplished for solving the problem, and demonstrate that these tasks have not only been completed, but that they have also been effective in solving the problem.

With respect to the Peach Bottom Atomic Power Station readiness for restart review, all but the last two of the items listed above had not only been completed, but also had been formally accepted by the NRC prior to scheduling a team inspection. The team's activities were designed to confirm the corrective actions and verify that corrective actions had been completed and had been effective. In the case of Calvert Cliffs, I am not aware whether the root cause analyses or corrective actions under the Performance Improvement Plan Implementing Procedures have yet been accepted by the NRC. This is not to say that we believe they have not been accomplished, or successfully completed. We simply do not know the status of BG&E corrective action review by the NRC. Has the NRC formally approved any effort expended by BG&E or, in the context of the Performance Improvement Plan, any information submitted to the NRC? We haven't yet received the standard documentation of their acceptance.

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BG&E has identified a list of root causes, as contained in the PIP, which is still undergoing review by the NRC. We assume that the same root causes which must be identified in order to solve long term problems are those necessary to satisfy Action 2 of the May 25, 1989 Confirmatory Action Letter. Since the CAL requires identification of root causes, will the NRC formally accept (or possibly require some modification to) BG&E's root cause portion of the PIP prior to restart, as was the case during the Peach Bottom review? It is unclear whether the team inspection will be responsible for reviewing the adequacy and acceptability of root causes. If so, will the team inspection be responsible for determining whether BG&E has properly identified the correct plan of attack and list of corrective actions? If not, it appears that these items will have to be addressed prior to the inspection.

It would seem prudent to establish the acceptability of some of these items prior to the inspection, especially the list of corrective actions. BG&E has been aggressively working off a list of action items, without any formal notice from the NRC as to the sufficiency of the action items. BG&E risks having to substantially alter or add corrective actions pending formal review and does so at the extreme risk that accomplishing the items may not satisfy the requirements of the Confirmatory Action Letter. I think this should quickly be resolved.

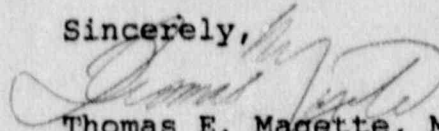
For example, BG&E reduced the size of the work force on site and the number of jobs being worked as one of its corrective actions designed to gain control of work activities. That was, I believe, a prudent first step and showed sound judgement on their part, and it appears a straightforward and simple step to verify. However, formal NRC review may determine that completing this task may be necessary but not sufficient to address the problem of inadequate control of work activities. Addressing the issue of sufficiency (Does BG&E now have proper control of work activities? What level of work is appropriate? What level of work can BG&E adequately control? Can the level of staff now be increased to its old level? If not the old level, what level? If not now, when?) probably should be accomplished by reviewing the list of corrective actions, not just whether or not the actions listed have been accomplished.

Before BG&E proceeds further on its own initiative to try to correct problems which they hope will hit the NRC target for reauthorization to restart, the NRC target should be confirmed. This way, BG&E can be sure that what they're aiming for is what they're supposed to hit.

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I would appreciate the opportunity to discuss these questions with you or members of the Region I or headquarters staff.

Sincerely,



Thomas E. Magette, Manager
Nuclear Programs

TEM/npd
cc: George Creel, BG&E
Scott McNeil, NRC
James Peck, DNR