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VICE PRESIDENT
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October 23, 1989

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
Reply to NRC Inspection Report Nos. 50-317/89-21; 50-318/89-21

REFERENCE: (a) Letter from Mr. J. P. Durr (NRC) to Mr. G. C. Creel (BG&E),
dated September 21, 1989, Inspection Report Nos. 50-317/89-21;
50-318/89-21

Gentlemen:

Enclosed is our response to a Notice of Violation and a Notice of Deviation identified
in Reference (a).

Should you have any further questions regarding this matter, we will be pleased to
discuss them with you.

Very truly yours,

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PDR ADDCK 05000317
G PNU

J. R. Lemon
for G. C. Creel
Vice President - Nuclear Energy

GCC/JMO/dlm

Enclosure

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ENCLOSURE

REPLY TO INSPECTION REPORT NOS. 50-317/89-21; 50-318/89-21

I. NOTICE OF VIOLATION

The Notice of Violation described in Appendix A of Reference (a) indicates that BG&E's Non-destructive Examination (NDE) Control Procedure (CP) 5.002 does not conform to the NDE Recertification Requirements invoked by ASME Section XI (i.e., BG&E allows a sixty-day extension of the three-year certification period). The American Society for Non-destructive Testing (ASNT) has published a Recommended Practice No. SNT-TC-1A, "Personnel Qualification and Certification in Non-destructive Testing." The scope of the Recommended Practice, described in its first paragraph, notes:

1.4 It is recognized that these guidelines may not be appropriate for certain employers' circumstances and/or applications. In developing a written practice as required in Par. 5, the employer shall review the detailed recommendations presented, herein, and shall modify them as necessary to meet particular needs.

In paragraph 9.7.1, the Recommended Practice notes that "all levels of NDT personnel should be recertified at least once every three years"

Since April 1, 1987, we have committed to the 1983 edition through Summer 1983 addenda of ASME Section XI. Sub-article IWA-2300, "Qualification of Non-destructive Examination Personnel" states:

(a) Personnel performing non-destructive examination operations shall be qualified with a written procedure prepared in accordance with SNT-TC-1A 1980, except as required in (1), (2), and (3) below

The first exception listed includes the statement:

All Level I, II and III personnel shall be recertified by examination on a triennial basis.

Prior to April 1, 1987, we were committed to the 1974 edition through Summer 1975 addenda of ASME Section XI. Sub-article IWA-2300 of this version states:

(a) Personnel performing non-destructive examination operations shall be qualified with a procedure prepared in accordance with SNT-TC-1A for the applicable examination technique and methods.

Note that prior to April 1, 1987, ASME Section XI invoked the Recommended Practice with no exceptions and we modified the certification period to allow a sixty-day extension (see paragraph 1.4 above). Therefore, prior to April 1, 1987, we were not in violation of ASME Code requirements as described in Appendix A of Reference (a).

ENCLOSURE

REPLY TO INSPECTION REPORT NOs. 50-317/89-21; 50-318/89-21

A. Corrective Steps that have been Taken and the Results Achieved

1. On August 18, 1989, we deleted (by memo) the provision for a sixty-day extension of certification. On September 29, 1989, NDE CP 5.002 was formally revised to delete the sixty-day extension of certification.

2. An initial review of NDE personnel records, from April 1, 1987 to the present, indicated the provision for a sixty-day extension of certification has not been exercised for ASME Section XI examinations.

B. Corrective Steps that Will be Taken to Avoid Further Violations

The final review of NDE personnel records, from April 1, 1987 to the present, will be completed by November 10, 1989.

C. Date When Full Compliance Will be Achieved

Full compliance was achieved on August 18, 1989. Prior to April 1, 1987, we were in full compliance with the recommended practice for recertification that is described in SNT-TC-1A.

II. NOTICE OF DEVIATION

The Notice of Deviation described in Appendix B of Reference (a) indicates that our Calvert Cliffs Instruction (CCI) 613D, "Qualification of Test and Inspection Personnel" deviates from our commitment to ASME Code Requirements and established the visual examination program under ANSI N18.1-1971, instead of ANSI N45.2.6-1973.

ASME Code Section XI 1983 with Summer 1983 Addenda paragraph IWA-2300(c) states:

Personnel performing the visual examinations VT-2, VT-3, and VT-4 of IWA-2212, IWA-2213, and IWA-2214, respectively, shall be qualified by the Owner or the Owners' agent in accordance with the comparable levels of competency as defined in ANSI N45.2.6-1973.

ASME Boiler and Pressure Vessel Code Case N-424 is approved for use in Regulatory Guide 1.147, Revision 6. The Code Case is referenced in our Program Plan for the Second Inspection Interval for Calvert Cliffs Nuclear Power Plant,

ENCLOSURE

REPLY TO INSPECTION REPORT NOS. 50-317/89-21; 50-318/89-21

Units 1 and 2, Table 6, Summary of Regulatory Guide 1.147 Code Cases. The Code Case states:

It is the opinion of the Committee that ANSI/ASME N45.2.6-1978 may be used instead of ANSI N45.2.6-1973 when qualifying examination personnel to perform VT-2, VT-3, and VT-4 visual examinations for Section XI, Division 1.

Additionally, in the Quality Assurance Policy (Revision 19), Table 1B1, page 48, "BG&E's Position on Guidance Contained in ANSI Standards," we state,

All other BG&E personnel [other than personnel of BG&E's Quality Control organizations within QASD] who perform inspection, examination, and testing functions associated with normal operations of the plant are qualified either to Regulatory Guide 1.58 (which endorses ANSI N45.2.6) or to ANSI N18.1-1971.

The UFSAR contains the same exception in Chapter 1B, Table 1B-1.

CCI-613D, as written complies with both standards. It references ANSI N45.2.6-1978. However, in its introduction section, CCI-613D states,

All Nuclear Energy Division (NED) personnel conducting, reviewing or scheduling Engineering Test Procedures, Functional or Surveillance Tests or receipt inspections on spare parts must either be qualified per this instruction or per a formal training program conforming to the requirements of ANSI N18.1-1971.

In the and other cases where ANSI N18.1-1971 is referenced in CCI-613D, similar exceptions are described. The exception is not intended to apply to ASME Code Section XI NDE personnel.

CCI-613D is written to administratively control the qualification of a wide range of test and inspection personnel. It is not written to exclusively apply to ASME Code Section XI NDE personnel. As it is currently used for qualification of ASME Code Section XI VT-2, VT-3 and VT-4 examiners, CCI-613D meets ANSI N45.2.6-1978 requirements. Therefore, we have not deviated from a commitment to ASME Code requirements as described in Appendix B of Reference (a).