

U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-317/80-17  
50-318/80-16

Docket No. 50-317  
50-318

License No. DPR-53  
DPR-69 Priority \_\_\_\_\_ Category C

Licensee: Baltimore Gas and Electric Company  
P.O. Box 1475  
Baltimore, Maryland 21203

Facility Name: Calvert Cliffs Nuclear Power Plant, Units 1 and 2

Inspection at: Lusby, Maryland and Baltimore, Maryland

Inspection conducted: September 16-19, 1980

Inspectors: *G. Napuda* 10/17/80  
G. Napuda, Reactor Inspector date signed

Approved by: *E. G. Greenman* 10/21/80  
E. G. Greenman, Chief, Nuclear Support date signed  
Section No. 2, RO&NS Branch

Inspection Summary:

Inspection on September 16-19, 1980 (Combined Inspection Report No. 50-317/80-17; 50-318/80-16)

Areas Inspected: Routine unannounced inspection by a region-based inspector of Quality Assurance Program (QAP) implementation including: Auditing; Design Changes/Modifications; QAP Changes; and followup on prior identified items. The inspection involved 25 inspector-hours onsite by one NRC region based inspector and seven inspector-hours at the corporate offices by one region based inspector and the senior resident inspector.

Results: Noncompliances - None

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## DETAILS

### 1. Persons Contacted

- \*A. Anuje, QA Engineer
- E. Bower, Supervisor-Modification/Computer Group
- \*F. Browne, Jr., QA Auditor
- \*\*J. Carroll, General Supervisor of Operations (Acting Chief Engineer)
- J. Carter, Supervisor-QC
- \*R. Douglass, Manager-QA
- W. Evans, QA Specialist
- R. Heibel, Acting Supervisor-Technical Support Group
- \*\*G. Hinton, Supervisor-Quality Assurance Auditing
- J. Hoppa, Senior QA Auditor
- J. Lawson, Technical Specialist
- C. Phifer, Supervisor-Nuclear Plant Documents
- \*\*T. Sydnor, General Supervisor-Operations Quality Assurance
- A. Thornton, Principle Engineer
- \*\*J. Tiernan, Manager of Nuclear Power

### Other Accompanying Personnel

- \*\*R. Architzel, Senior Resident Inspector
- \*\*\*K. Choi, South Korea Nuclear Bureau

The inspectors also held discussions with and interviewed other corporate office personnel and station administrative, engineering, operations, quality assurance and technical support staff.

- \*denotes those present at the September 17, 1980 exit interview.
- \*\*denotes those present at the September 19, 1980 exit interview.
- \*\*\*denotes those present at both exit interviews.

### 2. Licensee Action on Previously Identified Items

(Closed) Unresolved Item (317/78-17-01; 318/78-11-01): Appropriateness and timeliness of corrective action associated with Station Audit 2-30-77. The remaining open finding is preventive maintenance on large electric motors, pumps, etc. and the assigning of responsibilities with necessary interfacing. During a September 3, 1980 management meeting the licensee decided to establish an interdepartmental task force to identify those responsible for various work and interfacing that is required. The inspector examined two warehouses and noted that there was no stored equipment that required the type of preventive maintenance that the audit finding addresses. The inspector stated that he had no concern under the circumstances but should such equipment be stored in the warehouses in the future the licensee's QA Program requires that procedures address the necessary preventive maintenance and its accomplishment. The licensee acknowledged the inspector's statement.

(Closed) Unresolved Item (317/78-17-04; 318/78-11-04): Implementation of corrective action associated with finding about records (ANSI N45.2.9) during Audit 1-7-76-EED-1. The two findings were resolved March 28, 1977 and the followup action (RWDs 77-6 and 7) were closed May 31, 1979. The Joint Utility Management Audits of 1978 and 1979 identified similar records problems and the two findings (E9 and EQA-2) were closed June 7, 1980. The inspector had no further questions on this item, however an unresolved item addressing records is discussed in Paragraph 3.

(Closed) Deficiency (317/79-16-01; 318/79-11-01): Sleeving platform not fabricated as safety related. The licensee issued a corrective action request, NCR 1441, against work order M-78-306 under which the subject fabrication was done. The corrective action was completed and the NCR was closed. The inspector also reviewed various documentation that verified the licensee's corrective actions as described in their letter to RI dated December 28, 1979.

(Closed) Unresolved Item (317/79-16-04; 318/79-11-04): Implementation of T.S. change (Section 6.2.2) prior to NRC approval. Amendments 43 (Unit 1) and 26 (Unit 2) which addressed these changes were submitted to the NRC who approved those amendments July 31, 1980.

### 3. Quality Assurance Program Review

The inspector reviewed on a sampling basis, changes made to the Quality Assurance Program implementing procedures identified in subsequent paragraphs with an asterisk. The inspector also reviewed the two procedures listed below. Revisions were reviewed to verify that they were consistent with the licensee's accepted Quality Assurance Plan. During this inspection, discussions were held with licensee personnel and the inspector confirmed that they were aware of and were implementing the changes.

The procedures reviewed were:

- QAP-7, Records Management, Revision 12
- QAP-17, Control and Calibration of Measuring and Test Equipment

#### a. Findings

QAP-17 was revised to make it agree with the T.S. requirement to retain records for five years. The licensee is in the process of revising the FSAR description of the QA Program and intends to have their records protection/retention system comply with ANSI N45.2.9-1979. The inspector informed the licensee that NRC-NRR has not yet approved that standard and discussed the differences between the 1974 and 1979 versions of the standard and compared both with NQA-1 (records section) and the provisions of RG 1.88. The inspector stated that the licensee should contact NRR regarding records prior to revision of the records system and implementing procedures.

The inspector examined the records storage vault and the degree of protection it afforded the single copy type records stored there. The vault lacked the four hour rated door required by ANSI N45.2.9-1974 to which the licensee is committed, but its construction met the latest NRR position on single copy records protection.

This item is unresolved pending the licensee's submittal to NRC-NRR of their intended change with respect to records system requirements and the implementation of the NRC-NRR approved resolution (317/80-17-01; 318/80-16-01).

#### 4. Audits

##### a. References

- QADP-2, Training Quality Assurance and Quality Control Personnel, Revision 4\*
- QADP-3, Audits of the Quality Assurance Department, Revision 0
- QADP-4, Documenting Conditions that Affect Quality, Revision 3\*
- DAP-21, Review and Audit of the Quality Assurance Program, Revision 10\*
- QAP-26, Control of Conditions Adverse to Quality, Revision 24\*
- EQAUP-5, Quality Assurance Audits, Revision 9\*
- OQASP-7, Quality Assurance Audits, Revision 8\*
- Offsite Internal Audit Schedule and Record for Year 1980, dated August 14, 1980
- 1980 Audit Schedule and Log-Internal
- 1979 Audit Schedule and Log-Internal
- Operations Quality Assurance Section Audit Schedule 1980, Revision 3

##### b. Audit Review

The inspectors reviewed the long range audit schedule to verify that the areas to be audited and the audit frequencies are consistent with Technical Specifications requirements and FSAR commitments. Additionally, selected audits were reviewed to determine that:

- Written procedures or checklists were utilized during the audit.

- Audits were conducted by trained personnel not having direct responsibility in the areas being audited.
- Audits reports were documented and reviewed by management having responsibility in the audited areas and by corporate management.
- Appropriate followup actions, including re-audit if necessary, had been taken, were in progress, or were being initiated.
- Frequency of the audits was in conformance with Technical Specifications and the QA Program.
- The audited organization responded in writing to the audit findings.

The audits reviewed were:

Engineering Quality Assurance Unit

- QAG 61-0QAS, QA/QC-79-1, Operations Quality Assurance
- QAG 61-15-79-EED-2, EED-Nuclear Engineering Section
- QAG 61-80-EED-03, Electric Engineering Department Modification Activities
- QAG 61-1980, Joint Utility Management Audit of QA Department

Operations Quality Assurance Section

- 4-23-80, Reload Core Design and Procurement of Core Components
- 15-15-80, Changes, Tests and Experiments
- 15-27-79, Microfilm Records Group Offices

No unacceptable conditions were identified.

5. Design Changes/Modifications

a. References

- QAP-15, Changes, Tests and Experiments, Revision 27

- QAP-35, Control of Technical Support and Plant Engineering, Revision 4
- QAP-28, Control of Items Covered by the Quality Assurance Program, Revision 11
- QASP-8, Review of Plant Maintenance and Functional Test Procedures, Revision 4

b. Implementation Review

The inspector reviewed selected modification packages to verify that:

- 10 CFR 50.59 reviews were performed and documented;
- Design changes/modifications were reviewed in accordance with the requirements of the technical specifications and the QA program;
- Design changes/modifications were accomplished in accordance with written procedures (selected instructions/procedures);
- Acceptance testing was accomplished and deemed satisfactory;
- Procedures and drawings required to be changed or generated as a result of the design change/modification were updated, generated or identified for such action; and,
- The design change/modification package has been transmitted to the records retrieval department for incorporation as a plant record.

The following Facility Change Request packages were reviewed.

- 79-1005, Relief Valves-Change Cylinder Material
- 79-1046, Add Remote Manual Operators to Main Steam Bypass Valves to Auxiliary Feed Pumps (Engineering complete, work to be done)
- 79-1003, Modify Certain Containment Isolation Valves to Actuate on SIAS vice CIS-Provide SIAS Override to Sample Valves, Modify Component Cooling Valves to Operate after CIS (IE Bulletin 79-06B, Item 3-Phase 1 completed)

- 80-0074, Rewire Diesel Generator Exciter Control and Simplify Various Drawings (Detail engineering in process, work to be done)

No unacceptable conditions were identified.

6. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance or deviations. An unresolved item is discussed in Paragraph 3.

7. Entrance and Exit Interview

Licensee management was informed of the purpose and scope of the inspection at the entrance interview, and the findings of the inspection were periodically discussed with the licensee representatives as indicated in the following summary.

<u>Date</u>	<u>Reportable Details Covered</u>
September 16, 1980	Entrance Interview
September 17, 1980	2, 3
September 18, 1980	2
September 19, 1980	2, Exit

The inspector conducted an exit interview with licensee representatives (denoted in Paragraph 1) on September 17 at the corporate offices and at the station upon conclusion of the inspection. The findings of the inspection, as applicable, were presented at these exits and acknowledged by the licensee.