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December 27, 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
Response to Unresolved Item 50-317/89-29-01; 50-318/89-31-01

REFERENCE: (a) Letter from Mr. R.P. Bellamy (NRC) to Mr. G. C. Creel (BG&E),
dated November 29, 1989, NRC Inspection Report Nos.
50-317/89-29; 50-318/89-31

Gentlemen:

As requested in Reference (a), we are providing the following response to the subject Unresolved Item which concerned missing documentation of calibration of the Waste Gas Holdup System Monitor (RI-2191) and the Liquid Discharge Monitor (RI-2201). In Reference (a), Mr. Bellamy asked us to review the item and respond with actions planned or taken in regard to this item and their results. We have been unable to locate the actual results of the calibration performed on May 27, 1988 using Surveillance Test Procedure STP-M-567-0.

Reference (a) states that the inspector verified that the calibration had been documented in the E&C Department Calibration Log and the Shift Supervisor's Log. This provides evidence that the STP was successfully performed on May 27, 1988. The monitors were found to be within calibration when STP-M-567-0 was performed on November 18, 1989.

ACTION TAKEN

We have concluded that this problem was caused by inadequate procedural control of STPs and inattention to detail on the part of the personnel completing the test. On August 29, 1989, Calvert Cliffs Instruction CCI-104, Surveillance Test Program was revised to require tighter control over STPs and their associated documentation. A Site Surveillance Test Program Manager (SSTPM) is responsible for administering the surveillance test program. He has single point accountability for the program. A Functional Surveillance Test Coordinator (FSTC) is assigned to oversee the preparation, scheduling, revision, review and postponement of STPs for each functional organization (e.g. operations, maintenance, etc.) at the plant. Each FSTC

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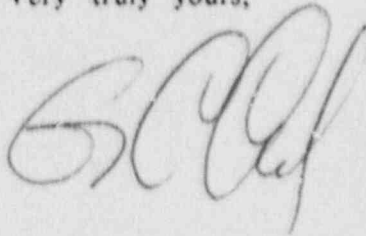
is also responsible for ensuring that he receives completed STPs and forwards them to the SSTPM to be filed. CCI-104 requires the SSTPM to maintain an active file of recently completed STPs. This level of control and accountability did not exist at the time the surveillance records were misplaced. We believe that the changes to CCI-104 are sufficient to preclude recurrence of this problem and propose no further corrective action.

RESULTS

A spot check of surveillances scheduled and completed since the procedure was revised found no instances of lost data.

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

Very truly yours,



GCC/DWM/db

cc: D. A. Brune, Esquire
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