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February 9, 1990

GEORGE C. CREEL
VICE PRESIDENT
NUCLEAR ENERGY
(301) 260-4455

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
Proposed Change to the Quality Assurance Description in the Final
Safety Analysis Report

REFERENCES: (a) Letter from Mr. G. C. Creel (BG&E) to Document Control Desk
(NRC), dated January 31, 1990

Gentlemen:

The attached pages from our Final Safety Analysis Report (FSAR) supercede those provided in the attachment to reference (a). The revised attachment pages reflect the fact that Technical Support Procedures have been replaced by Engineering Test Procedures. This matter has been discussed with Mr. H. I. Gregg of the Region I staff and determined to be acceptable.

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

Very truly yours,

GCC/RJP/bjd

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
W. T. Russell, NRC
J. E. Beall, NRC
T. Magette, DNR
P. K. Eapen, NRC
H. I. Gregg, NRC

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TABLE 1B-3

BALTIMORE GAS AND ELECTRIC COMPANY'S POSITION
ON GUIDANCE CONTAINED IN ANSI STANDARDS

Revision of Industry Standards Applicable to the
Baltimore Gas and Electric Quality Assurance Program

Requirement

Some of the Industry Standards listed in Section 1B.2 identify other Standards that are required, and some Regulatory Guides define the revisions of those Standards that are acceptable to the NRC.

Response

BG&E's QA Program was developed to respond to the specific revision of the documents listed in Section 1B.2 and is not necessarily responsive to other documents listed in the referenced industry Standards.

ANS 3.2 - 1976

Item 1

Requirement

Section 5.2.15 requires that plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure every two years to determine if changes are necessary or desirable.

Response

BG&E applies this requirement of a two-year review to all plant procedures except test procedures performed less often than every two years or at unspecified frequencies. These are reviewed no more than 60 days before performance.

41 ← INSERT "A"
Reason

Engineering Test Procedures (ETPs) and others like them are written for a one-time-only performance and kept for reference for future similar tests. If they are used again, they are reviewed and modified to meet conditions existing at the time of performance.

Some Surveillance Test Procedures (STPs) are performed every three to five years. They too are reviewed before each performance to ensure that they are compatible with existing conditions and responsive to current needs.

41 ← INSERT "B"

Insert "A" (new paragraph)

A one-time extension of the two-year review requirement has been allowed for plant procedures until they can be addressed under the Procedure Upgrade Plan (PUP) conditional upon a documented justification. Procedures or groups of procedures (by type) that have lapsed periodic reviews and that do not have a documented justification for continued use will be restricted from use until they are either reviewed or justification is provided. The extension will expire for each procedure on an individual basis once it has been revised under PUP. The PUP is described in the Performance Improvement Plan transmittal letter from G. V. McGowan (BG&E) to J. M. Taylor (NRC) dated July 31, 1989, and is expected to be complete in December 1992.

Insert "B" (new paragraph)

Justification for the one-time extension of two-year review requirements is provided in our extension request letter from G. C. Creel (BG&E) to the USNRC Document Control Desk, dated January 31, 1990.