



CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

May 13, 1982

U.S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
Washington, DC 20555

ATTN: Mr. James M. Taylor, Director  
Division of Reactor Programs

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Performance Appraisal Inspection 50-317/82-01; 50-318/82-01

REFERENCE: (a) NRC Letter to A. E. Lundvall, Jr. from J. M. Taylor dated  
April 14, 1982, same subject

Gentlemen:

In response to reference (a), this letter describes the actions taken and planned to improve our management controls over Corrective Action Systems. Additionally, it describes the actions taken and planned to improve our management controls over the adequacy and review of 10 CFR 50.59 Safety Evaluations for Facility Changes

As a result of the Performance Appraisal Inspection (50-317/82-01; 50-318/82-01) an ad hoc committee was appointed to develop a plan for the improvement of our Corrective Action Systems. The following plan, which includes some actions already in progress was developed:

1. We have an established mechanism to trend Non-Conformance Reports (NCRs) and Quality Assurance Audit Findings. We will expand this system to include Licensee Event Reports (LER's). This improvement will be completed by July 1, 1982, for new LER's and by July 1, 1983, for the backlog of LER's.
2. The charters for the Off-Site Safety Review Committee (OSSRC) and the Plant Operations Safety Review Committee (POSRC) will be revised to insure that our Corrective Action Systems are adequately monitored. These changes will be completed by October 1, 1982.

8206070199 820513  
PDR ADOCK 05000317  
Q PDR

IE-01  
5  
1/0

Mr. James M. Taylor  
May 13, 1982  
Page 2

3. Quality Assurance procedures will be revised to specify the requirement for audits of our Corrective Action Systems. These procedures will be completed by August 1, 1982. Since the OSSRC and POSRC charters already require review of all Quality Assurance audits, the review of Corrective Action Systems audits will automatically occur under the existing charters.
4. Under Special Order 81-03, "Event Reports," of December 15, 1981, the Plant Superintendent established a mechanism to initiate the investigation of significant events not otherwise investigated and documented in another type of report, such as an LER.
5. Training on our Corrective Action Systems will be provided to all personnel during the General Orientation Training refresher course. This training will emphasize the availability of the Corrective Action Systems to all personnel and their responsibility for using the system when they believe a deficiency exists. This training will be incorporated in the refresher course by October 1, 1982.
6. We will continue to process a previously drafted change to Quality Assurance Procedure (QAP)-26, "Control of Conditions Adverse to Quality." This change contains elements designed to improve our management control of Corrective Action Systems.

We believe the changes listed above provide the improvements necessary to support adequate Corrective Action Systems. Beyond these specific changes, we have two broad initiatives which will result in further enhancement of our Corrective Action Systems. The first is the creation of a work unit with corporate responsibility for equipment reliability. The unit was created in 1979 and reports directly to a Corporate Officer. This unit is developing a system/equipment/component identification program for the entire Company including the Calvert Cliffs Nuclear Power Plant. Through this identification program a data base will be established which can be used for trending purposes. The second initiative is the appointment of a task force with representatives from appropriate functional areas who will review and revise QAP-26. Any changes identified by this task force will supplement and be coordinated with the changes already identified by the draft of QAP-26 mentioned in item six above. Beyond review and revision of the Corrective Action System now described in QAP-26, the task force will be responsible for a comprehensive review of the Corrective Action System area. The task force will be appointed by June 1, 1982.

Mr. James M. Taylor  
May 13, 1982  
Page 3

Several steps which have been, or will be taken to improve our management controls over the several weaknesses identified in the area of 10 CFR 50.59, Safety Evaluations for Facility Changes, particularly in the adequacy of, and review of, these evaluations (Section 2A, Observation 8, Performance Appraisal Inspection 50-317/82-01; 50-318/82-01), are as follows:

1. Representatives from the Electric Engineering (EED) and Nuclear Power Departments are drafting a revision to the safety evaluation criteria to better identify those Facility Change Requests (FCR's) which require a 50.59 analysis and subsequent OSSRC review.
2. Written criteria will be developed and approved by the OSSRC which will specify which safety evaluations (at a minimum) should be reviewed by the full committee.
3. A subcommittee of two OSSRC members (not associated with EED) has been named to review all safety evaluations to verify their adequacy and further, to see that those evaluations which meet the written criteria for presentation to the OSSRC are presented to the committee. This subcommittee is reviewing all safety evaluations prepared since the last regular OSSRC review of FCR safety evaluations in 1981.
4. The Electric Engineering Department has conducted a training program to assure that personnel responsible for writing safety evaluations, processing FCRs, and screening safety evaluations have a comprehensive understanding of 10 CFR 50.59 requirements, including the definition of an unreviewed safety question, and the implementing procedure EEDP-2, "Control of Changes, Tests, and Experiments." This training of EED personnel, together with the additional criteria, approved by the OSSRC should result in more comprehensive safety evaluations.
5. The manner of reporting safety evaluations reviewed by the OSSRC will be modified to be more specific as to which safety analyses were reviewed by the full committee or by the subcommittee.
6. To avoid a recurrence, this activity will be audited annually and the effectiveness of the safety evaluation review process reported to the OSSRC.

The proposed improvements regarding 10 CFR 50.59, Safety Evaluations, should be fully implemented by September 30, 1982.

