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December 17, 1993

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
Request for Meeting to Discuss the BG&E Self-Assessment of Service Water
Systems

- REFERENCES:
- (a) Meeting between Baltimore Gas and Electric Company and Nuclear Regulatory Commission, August 5, 1993, King of Prussia, PA, "Calvert Cliffs Service Water System Operational Performance Inspection (SWSOPI) Project"
 - (b) Letter from Mr. R. E. Denton (BG&E) to NRC Document Control Desk, dated August 6, 1993, "Independent Performance Inspection of the Service Water Systems Operation Performance"
 - (c) Letter from Mr. M. W. Hodges (NRC) to Mr. R. E. Denton (BG&E), dated August 12, 1993, "Calvert Cliffs, Units 1 and 2 Service Water System Operational Performance Inspection (SWSOPI)"
 - (d) NRC Inspection Manual, Temporary Instruction 2515/118, Revision 1, "Service Water System Operational Performance Inspection (SWSOPI)," dated February 11, 1993
 - (e) NRC Inspection Manual, Inspection Procedure 40501, "Licensee Self-Assessments Related to Area-of-Emphasis Inspections, dated August 12, 1993

The Baltimore Gas and Electric (BG&E) Company understands that the Nuclear Regulatory Commission (NRC) has scheduled a Service Water System Operational Performance Inspection (SWSOPI) at the Calvert Cliffs Nuclear Power Plant (CCNPP) during the first quarter of 1994. At a meeting with NRC Region I personnel on August 5, 1993 (Reference a), BG&E proposed to perform an independent self-assessment as an alternative to the NRC SWSOPI. In Reference (b), BG&E forwarded a summary of the meeting and a proposed plan to perform the self-assessment. In

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Reference (c), you indicated that the NRC will make every effort to minimize the impact of the inspection by using BG&E's self-assessment results to the extent practical.

Since then, we have completed the independent self-assessment. As noted in References (a) and (b), we also completed an additional assessment of safety-related service water systems using an outside contractor. These two assessments encompassed both the open- and closed-loop service water systems, i.e., Saltwater, Service Water, and Component Cooling Water Systems. Baltimore Gas and Electric Company has devoted substantial resources to performing these assessments. Over 100 engineer-weeks were dedicated to both self-assessment efforts by contractor and BG&E personnel. We have entered the 79 identified findings into our corrective action process to ensure that they are properly resolved. Copies of both assessments are available for your review.

Because our assessments and the associated documentation are now complete, BG&E proposes to meet with NRC personnel from Region I and the Office of Nuclear Reactor Regulation (NRR) to discuss the NRC's SWSOPI. Specifically, we would like to discuss using our assessments as a basis to obtain appropriate reduction in the inspection scope, consistent with Section 11.03 of Temporary Instruction (TI) 2515/118, Revision 1 and NRC Inspection Procedure (IP) 40501 (References d and e). At the meeting, we would review the self-assessment efforts and results, including specific findings and the status of our actions in response to Generic Letter 89-13. In addition, we would like to discuss qualifications and experience of the BG&E assessment teams, and the extent to which the assessments addressed the inspection requirements of TI 2515/118, Revision 1.

Baltimore Gas and Electric Company recognizes that the timing of the assessments did not permit the NRC to review the assessment planning and in-process implementation as specified in IP 40501. However, BG&E considered it important to address service water system issues proactively by performing the assessments to determine if industry-identified issues were applicable to Calvert Cliffs. Baltimore Gas and Electric Company should not be precluded from remaining as a candidate for the pilot program under IP 40501 simply because we aggressively scheduled our assessments in 1992 as part of our Continuing Improvement Program. In our view, a reduced scope of your SWSOPI is justified for several reasons, including the following:

- ♦ Baltimore Gas and Electric Company's assessments are recent and based upon the provisions of TI 2515/118, Revision 1.
- ♦ Baltimore Gas and Electric Company's assessments are in-depth. For example, our expenditure of resources to assess the open-loop service water system is approximately five times greater than typical NRC resource expenditures of approximately 15-20 inspector-weeks of document review and on-site walkdowns for a SWSOPI. Additionally, our assessments were broader in scope than a typical SWSOPI, covering not only the open-loop service water system, but also closed-loop systems.
- ♦ Our assessments utilized vertical-slice assessment methods to verify the functional capability of the systems, evaluate operational controls, maintenance, surveillance and other testing. Further, they covered planned and completed actions in response to Generic Letter 89-13. Issues and concerns identified during other plants' SWSOPIs were also reviewed for applicability to Calvert Cliffs.
- ♦ Baltimore Gas and Electric Company's assessments were performed by technically qualified teams. The initial assessment team was composed of seven individuals with experience in each of the five functional areas covered by TI 2515/118, Revision 1.

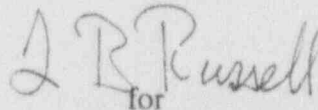
When architectural/engineering firm experience is included, their average experience exceeds 16 years of power plant experience. The second assessment team was composed of seven contractor personnel and six BG&E personnel with experience in the five functional areas. On average, the contractor members of the second assessment team had 13 years of power plant experience. The second assessment was conducted under the direction of BG&E's Quality Assurance Department.

- ♦ Baltimore Gas and Electric Company is developing/implementing a plan of corrective actions to resolve the findings of the assessments.
- ♦ Baltimore Gas and Electric Company has enhanced its design-basis documentation for CCNPP service water systems. Design validation was performed as part of the self-assessments.

For these reasons, BG&E believes that a reduction in the scope of the NRC's SWSOPI at CCNPP is warranted. Such a reduction in scope is consistent with TI 2515/118 Revision 1 and the policy reflected in IP 40501. In view of the schedule for the NRC SWSOPI, BG&E requests a meeting with the NRC as soon as practical to further discuss details on the two assessments and answer any questions the staff may have. Because this request relates to the staff policy reflected in IP 40501, we are providing copies of this letter to the appropriate NRR personnel designated in the Inspection Procedure.

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

Very truly yours,



R. E. Denton
Vice President - Nuclear Energy

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