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

October 3, 1990

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 Quality Assurance Program Description

Gentlemen:

Pursuant to 10 CFR 50.54(a)(3), please provide approval for the attached change to the Quality Assurance Program description contained in the Updated Final Safety Analysis Report (UFSAR) and the Quality Assurance (QA) Manual. We propose to change Table 1B-1, "Baltimore Gas and Electric Company's Position on Guidance Contained in ANSI Standards" from the UFSAR [Attachment (1)] and the QA Manual [Attachment (2)]. The proposed change will give Senior Reactor Operators the authority for approving certain temporary changes to procedures (i.e., changes which will not change the intent of the original procedure) while the Shift Supervisor's approval will no longer be required. Item 2 is added to this Table to denote our revised position concerning ANS 3.2-1976. Nuclear Regulatory Commission approval is required pursuant to 10 CFR 50.54(a)(3) because the proposed change constitutes a reduction in a quality assurance program commitment.

The proposed change will relieve the administrative burden on the Shift Supervisors by eliminating the need for them to approve temporary changes which do not impact the intent of the approved procedure. More of the Shift Supervisors' time can thus be devoted to more significant shift management responsibilities. Also, the proposed change brings consistency between the Quality Assurance Program description and the Technical Specification requirements, since Technical Specification 6.8.3.b requires that temporary changes to procedures be approved by someone who holds a senior reactor operator's license, not necessarily the Shift Supervisor.

If this change is approved, our quality assurance program would continue to satisfy Appendix B of 10 CFR Part 50. Reviews and approvals would be performed by individuals holding a senior reactor operator's license. These individuals possess the qualifications to ensure that changes do not affect the intent of the original procedure or have an adverse impact on plant safety. The reviews will benefit from the

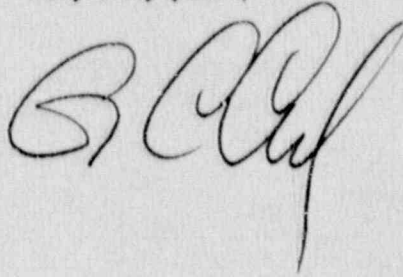
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larger pool of qualified individuals available to perform the review in that the review burden will be shared and the experience of additional operators will be included in the process. An additional benefit is that the Shift Supervisor will have fewer distractions and accordingly be able to devote more time to the supervision of safe plant operations.

Considering the above arguments, we conclude that the proposed change to our Quality Assurance Program will maintain the effectiveness of the procedure review process. We will be pleased to answer any questions you may have.

Very truly yours,



GCC/DBO/dlm

Attachments

- (1) Table 1B-1 from UFSAR (2 pages)
- (2) Table 1B-1 from QA Manual (2 pages)

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
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R. I. McLean, DNR

TABLE 1B-1

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.

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.

Insert

Item 2

Requirement

Section 5.2.2 specifies that temporary procedure changes that clearly do not change the intent of the approved procedure shall as a minimum be approved by two members of the plant staff knowledgeable in the areas affected by the procedure; and at least one of these individuals shall be the supervisor in charge of the shift and hold a senior operators' license on the unit affected.

Response

BG&E does not require the Shift Supervisor to be the Senior Reactor Operator (SRO) approving temporary changes to procedures; any active SRO (either on-shift or on-staff) may provide the SRO approval for procedure changes.

Reason

Many proposed temporary procedure changes do not require the Shift Supervisor's immediate attention or knowledge of the change since they do not affect plant safety. Other SROs are available and qualified to perform this task since the Shift Supervisor's detailed review of the proposed change is not necessary to ensure plant safety.

Requiring the Shift Supervisor to review all changes is burdensome and contrary to plant safety in light of the total number of procedures that exist and the time the Shift Supervisor must dedicate to ensuring the plant is safely operated and maintained. Additionally, our Technical Specification requires this approval be from someone holding an SRO license (not necessarily the Shift Supervisor).

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BALTIMORE GAS AND ELECTRIC COMPANY'S POSITION
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ANS 3.2 - 1976Item 1Requirement

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