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VICE PRESIDENT  
NUCLEAR ENERGY  
1200 260-4455

December 13, 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  
NRC Inspection Report Nos. 50-317/90-19 and 50-318/90-18

REFERENCES: (a) Telephone Conference: T. E. Forgette and L. S. Larragoite (BG&E) with E. F. Fox (NRC), same subject, October 25, 1990  
(b) Telephone Conference: T. E. Forgette (BG&E) with E. F. Fox (NRC), same subject, November 9, 1990

Gentlemen:

The subject Inspection Report discusses the results of Baltimore Gas and Electric Company's August 8, 1990 annual emergency preparedness exercise. Unresolved Item 90-19-02/90-18-02 was not described in sufficient detail to facilitate a clear understanding of the performance weakness. Therefore, the exercise evaluation team leader was contacted to establish a better understanding of the identified weakness [References (a) and (b)]. Attachment (1) to this letter conveys our current understanding of Unresolved Item 90-19-02/90-18-02.

Attachment (1) also provides a summary of action taken in response to Unresolved Item 90-19-03/90-18-03. This item addressed staff performance in the Technical Support Center.

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

Very truly yours,

GCC/LSL/bjd

Attachment

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Document Control Desk  
December 13, 1990  
Page 2

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ATTACHMENT (1)

**RESPONSE TO  
NRC INSPECTION REPORT NOS. 50-317/90-19 AND 50-318/90-18  
UNRESOLVED ITEMS**

The subject Inspection Report identified two weaknesses during the August 8, 1990 annual emergency preparedness exercise. Section 2.4 of the report defines weaknesses as follows:

"Exercise weaknesses are areas of the licensees' response in which the performance was such that it could have precluded effective implementation of the Emergency Plan in the event of an actual emergency in the area being observed. Existence of an exercise weakness does not itself indicate that overall response was inadequate to protect the health and safety of the public."

Baltimore Gas and Electric Company's (BG&E) understanding of these weaknesses, as well as planned corrective actions are provided below.

50-317/90-19-02; 50-318-90-18-02:

"Although telecommunications were good, there was poor human interface between Operation Support Center (OSC) and Technical Support Center (TSC) in communicating essential event information."

BG&E POSITION:

We do not describe nor provide for human interface between the OSC and TSC in the Calvert Cliffs Nuclear Power Plant (CCNPP) Emergency Response Plan. While this may be done ad hoc, full compliance with the Emergency Response Plan is realized by telecommunications between these centers.

Communications between centers is addressed by exercise objective 3.1. This objective assesses the:

"Ability of center directors and key personnel (including Team Leaders) to communicate by one or more of the following:

- (a) telephones,
- (b) face-to-face communication,
- (c) emergency message form,
- (d) radio, or
- (e) any back-up communications if primary communication fails"

Performance evaluation checklists for the OSC and TSC documented that this objective was successfully demonstrated during the exercise. Emergency Response Plan Implementation Procedure (ERPIP) 4.1.4, Operation Support Center, Action 6, requires the OSC-Director to initiate maintenance actions in response to Control Room requests. Operation Support Center activities are tracked on ERPIP 4.1.4, Attachment (3). This form provides for essential event information (e.g., job/equipment/work activity, priority, estimated completion date, and status). Action 6.b requires the OSC to transmit this document to the TSC at prescribed intervals. Seven

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transmittals were made during the exercise. Emergency message forms and Director logs for the OSC and TSC are also available to support and supplement adequate exchange of essential event information between centers.

**FOLLOW-UP WITH NRC:**

Two telephone conference calls were conducted with NRC staff [References (a) and (b)]. BG&E's position and basis were explained. NRC staff indicated that our position was acceptable, and that changes to BG&E's Emergency Response Plan, as a result of the exercise Inspection Report, were not expected.

**CONCLUSION:**

Based on our review of exercise records and follow-up discussions with NRC staff, we conclude that human interface between the OSC and TSC is not necessary to effectively implement the CCNPP Emergency Response Plan. No action will be taken subsequent to Unresolved Item 90-19-02/90-18-02. No change or difference is expected in exercise performance in future graded exercises.

**50-317/90-19-03 and 50-318/90-18-03:**

"TSC staff did not refer to TSC procedures or predesignated computational aids to assess plant conditions."

**BG&E POSITION:**

Our self-evaluation agrees with the NRC observation. To address this exercise weakness, a training session was conducted on August 14 and October 19, 1990, for TSC Core Engineers and other TSC staff. The scope of this training included: calculations of time to core uncovering and expected extent of core uncovering, a review of the scenario used for CALVEX-90, and an overview of the Emergency Response Plan (organization, facilities, interfaces).