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October 28, 1982

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. Richard W. Starostecki, Director
Division of Project and Resident
Programs

- REFERENCES: (a) Letter to R. W. Starostecki from A. E. Lundvall, Jr., dated August 4, 1982
- (b) Letter to A. E. Lundvall, Jr., from R. W. Starostecki, dated September 29, 1982
- (c) NRC RI: Combined Inspection 50-317/82-07; 50-317/82-07 dated May 24, 1982
- (d) Management Meeting 50-317/82-21 held on July 7, 1982

Gentlemen:

This refers to your September 29, 1982, letter to A. E. Lundvall, Jr., which transmitted two items of apparent noncompliance with NRC requirements. As requested, enclosure (1) to this letter is a written statement in reply to Item B of the Notice of Violation. We understand that no additional response for Item A is necessary

Your letter also requested that we describe the method to be used for periodically determining that all Plant Operations and Safety Review Committee (POSRC) responsibilities are being carried out in a technically complete and competent manner. The formally documented method used for this periodic determination is an annual audit conducted by our Quality Assurance Department. This audit is performed under the cognizance of the Off-Site Safety Review Committee (OSSRC) and the results are reported to both the POSRC and the OSSRC, as well as, the Manager of the Quality Assurance Department. During future audits of the POSRC (at least annually) a member of the OSSRC will be part of the Quality Assurance Department audit team. Furthermore, the Chairman of the POSRC has invited OSSRC members to attend any meeting of the POSRC they desire. (Regular meetings are normally held each Wednesday).

Although the Quality Assurance audit is the only formal method for periodic review of the POSRC activities, there are a number of ongoing processes which assure that POSRC responsibilities are being carried out in a technically complete and competent manner. Included in these processes are: (1) the review of POSRC meeting minutes by the OSSRC, (2) review by the OSSRC of items previously reviewed and accepted by the POSRC, (3)

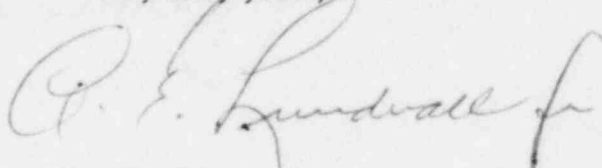
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the multi-discipline nature of the experience, background, and training that several of the POSRC members and their alternates embody, (4) the informal oversight of POSRC activities by the OSSRC during occasional joint POSRC and OSSRC meetings, (5) formal training and retraining programs for POSRC members and alternates currently under development, and (6) the administrative and management controls exercised through the POSRC charter, (Calvert Cliffs Instruction - 103). The adequacy of the POSRC review process is thereby assured and periodically determined. This conclusion is supported by NRC Inspection Report 50-317/82-23; 50-318/82-19, dated September 27, 1982, and Performance Appraisal Inspection 50-317/82-01; 50-318/82-01, dated April 14, 1982.

We are confident that our current procedures and administrative controls for the scope and conduct of POSRC meetings insure the technical competence and completeness of this review process. The approval of the Surveillance Test Procedure containing incorrect limits appears to be an isolated occurrence and not indicative of an overall weakness in the POSRC review process. Should you have further questions regarding this matter, we would be pleased to discuss them with you.

Very truly yours,



Vice President - Supply

AEL/DWL/gla

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC

ENCLOSURE (1)

ITEM B

In reference (a) we specified the addition of certain actions to prevent recurrence of similar violations. It is our belief that implementation of these actions will, in fact, upgrade the POSRC review process sufficiently to prevent recurrence. One of these actions was an audit by the Quality Assurance Department of selected plant procedures which incorporate Technical Specification limits. This audit has been completed and no similar violations were found.

Through the implementation of these actions we did not mean to imply that the POSRC review process has not been technically complete in other areas of responsibility. Rather, this event was isolated and we have committed to a program to prevent recurrence. We are committed to insuring that the POSRC and all personnel and groups overseeing the safety of Cavlert Cliffs function in a technically competent and responsible manner at all times. It is our conclusion that reference (a) did provide a satisfactory response to this item and we reaffirm our commitment to implement all of the actions specified therein.