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ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

November 29, 1982

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. Robert A. Clark, Chief  
Operating Reactors Branch #3  
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Generic Letter 82-17, "Inconsistency Between Requirements of 10 CFR  
50.54(t) and Standard Technical Specifications for Performing Audits of  
Emergency Preparedness Programs"

REFERENCES: (a) Generic Letter 82-17 from Darrell G. Eisenhut to All Licensees  
dated October 1, 1982  
(b) 10 CFR 50.554(t)  
(c) NUREG-0654 (Revision 1), "Criteria for Preparation and Evaluation  
of Radiological Emergency Response Plan  
(d) ANSI Standard N18.7-1976, "Administrative Controls and Quality  
Assurance for the Operational Phase of Nuclear Power Plants"

Gentlemen:

Reference (a) issues a request to All Licensees to verify that their Technical Specifications conform with Reference (b), in regard to annual reviews of the Emergency Response Plan (ERP). We have reviewed the applicable documents, both defining and implementing these requirements, and have determined that our facility is currently in conformance with and meets the intent of Reference (b).

There is, however, some ambiguity regarding the use of the terminology "review" and "audit" as it appears among various references. We, therefore, have referred to Reference (d), in providing a strict definition of these terms.

The definitions may be summarized as follows:

**Audit:** A methodical examination to determine conformance to requirements.

**Review:** A critical examination and evaluation to determine the adequacy of the requirements.

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ANSI Standard N18.7, Section 4, recognizes a difference between reviews and audits of programs and activities at operating nuclear power plants. The onsite operating organization, the Plant Operations and Safety Review Committee (POSRC), is responsible for assisting the Plant Manager (Plant Superintendent at Calvert Cliffs) in keeping abreast of general plant conditions and verifying that the day-to-day operating activities are conducted safely and in accordance with applicable administrative controls. The POSRC reviews and recommends to the Plant Manager for referral to the offsite committee all changes to the ERP.

Sections 6.5.1.4 and 6.5.1.6 of the Technical Specifications define the meeting frequency and responsibilities of the POSRC. The Committee convenes monthly, at a minimum, and is responsible for reviewing changes to the ERP and its implementing procedures and recommending changes to the Off-Site Safety Review Committee (OSSRC) for their review.

The OSSRC is addressed in ANSI N18.7, section 4. In addition to normal review responsibilities, the OSSRC maintains cognizance over all auditing activities associated with the ERP. All audits involve a verification of compliance and effectiveness of the implementation of Federal laws, internal rules, and procedures associated with the ERP. These audits of selected aspects of operational phase activities are performed at a frequency commensurate with their safety significance and in such a manner as to assure that the activity is audited every 24 months.

Sections 6.5.2.5, 6.5.2.7 and 6.5.2.8 of the Technical Specifications define the meeting frequency, review, and audit responsibilities of the OSSRC. The Committee convenes every 6 months, at a minimum, and is responsible for reviewing all changes to the ERP referred by the POSRC and is responsible for ensuring that an audit of the ERP is conducted at least once per 24 months.

Paragraph P.9 of Reference (c) provides that each licensee shall arrange for and conduct independent reviews of the emergency preparedness program at least every 12 months. Section 6.2.1 of the Calvert Cliffs Nuclear Power Plant ERP (Rev. #2 August 1, 1982) specifies that a formal independent review of the ERP and its Implementing Procedures and overall emergency preparedness will be performed annually, with a report submitted to Corporate and Plant Management and involved Federal, State and local organizations, as appropriate.

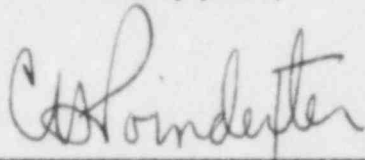
In summary, all changes to the ERP are reviewed within the required annual frequency by the POSRC and, in addition, an annual independent review is performed on all changes to the plan that have transpired since the last biennial audit. All changes to the plan or procedures arising as a result of the POSRC review are referred to the OSSRC and reviewed within the required frequency. An independent biennial audit is performed on the ERP and all deficiencies are referred to the OSSRC and others as previously mentioned.

To obviate any future misinterpretations of Reference (b), we suggest that Generic Letter 82-17 be rescinded and reissued with more clarification as to the use of the terms "review" and "audit". This clarification should reflect the guidance contained in Reference (d).

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If we can be of any further assistance in this matter, please do not hesitate to contact us.

Sincerely yours,

  
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for Vice President-Supply

AEL/LOW/sjb

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