

ROBERT E. DENTON  
Vice President  
Nuclear Energy

Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, Maryland 20657  
410 586-2200 Ext. 4455 Local  
410 260-4455 Baltimore



June 1, 1994

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Document Control Desk

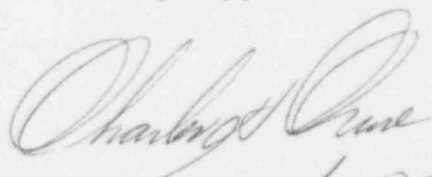
SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Reply to Notice of Violation -- Security Inspection

REFERENCE: (a) Letter from Mr. J. H. Joyner (NRC) to Mr. R. E. Denton (BGE),  
dated April 29, 1994, NRC Security Inspection Nos. 50-317/94-14;  
50-318/94-14 (4/4-7 and 14/94)

In response to Reference (a), Attachment (1) is provided. The Notice of Violation was dated April 29, 1994 but was not received by Baltimore Gas and Electric Company until May 9, 1994. The due date for our response was extended to June 8, 1994 by the Region on May 9, 1994.

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

Very truly yours,



for R.E. Denton

RED/MDM/bjd

Attachment

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

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## ATTACHMENT (1)

### REPLY TO NOTICE OF VIOLATION -- SECURITY INSPECTION NOS. 50-317(318)/94-14

#### I. DESCRIPTION AND CAUSE OF VIOLATION

Section 9.1 of the Nuclear Regulatory Commission (NRC) approved Calvert Cliffs Nuclear Power Plant Security Plan states, in part, that audits of the Security Program shall be performed under the cognizance of the Offsite Safety Review Committee every 12 (+3) months and that "The audit evaluates compliance with existing security and contingency plans and procedures as well as their potential impact on plant and personnel safety." Reference (a) indicates that our Security Program Audits for 1992 and 1993 failed to evaluate the potential impact of security and contingency plans on plant and personnel safety.

The Nuclear Quality Assurance Department uses an audit matrix to capture audit requirements contained in regulatory documents. This matrix is consulted prior to the start of each audit to ensure all requirements are captured in the audit plan. The Security Plan should have been reviewed for inclusion into the matrix, but it was not. Thus the matrix used in 1993 did not contain the explicit requirement to evaluate the impact of the Security Plan on plant and personnel safety. Likewise, no explicit conclusion with respect to the Security Plan's effect on plant and personnel safety was stated in the audit report. Despite these concerns, many observations were made in the 1993 audit which would have identified any potentially adverse impact of security operations on plant and personnel safety.

#### II. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

An evaluation of the Security Plan's impact on plant and personnel safety has been completed and documented in Surveillance Report S-94-2-08, dated May 20, 1994. The evaluation concluded that the Security Plan did not potentially adversely affect plant or personnel safety.

#### III. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

The 1994 Audit Matrix has been updated to include the requirement to evaluate and document the potential impact of security and contingency plans and procedures on plant and personnel safety.

Additionally, we have reviewed other NRC-approved plans to ensure all current auditing requirements have been identified and captured in the Audit Matrix. Some additional changes were made to the Audit Matrix as a result of our review. A note was also added to the matrix to require auditors to review the sections in each plan that contain the plan's auditing requirements for any changes, prior to the start of the audit, and to initiate changes to the matrix as necessary.

#### IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on May 20, 1994 when the evaluation of the Security Plan's potential impact on plant and personnel safety was completed and documented in Surveillance Report S-94-2-08.