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VICE PRESIDENT
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December 2, 1982

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

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

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 and 2, Docket Nos. 50-317 and 50-318
Response to Generic Letter 82-23, Darrell G. Eisenhut
to all Licensees of October 1, 1982

REFERENCES: a) Generic Letter 82-23
b) 10CFR 73.40 (D)
c) 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 the Code of Federal Regulations, Reference (b), with respect to annual reviews of the Safeguards Contingency Plan (Security Plan). We have reviewed the applicable documents defining and implementing these requirements and we have determined that our Facility is currently in conformance 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 the American National Standard, Reference (c), in securing a strict definition of these terms.

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The following discussion provides the basis for our finding of conformance:

Section 4 of ANSI Standard N18.7 defines the difference between reviews and audits of programs and activities at Operating Nuclear Power Plants. The onsite operating organization (Plant Operational and Safety Review Committee) 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. In part, the Plant Operational and Safety Review Committee reviews all changes to the Safeguards Contingency Plan and in fulfilling this responsibility recommends to the Plant Manager, for referral to the offsite committee, any subjects of potential concern. The Plant Manager in carrying out his responsibilities, refers all appropriate subjects to the Off-Site Safety Review Committee and independent reviewers.

The Off-Site Safety Review Committee, also addressed in section 4 of ANSI N18.7, is responsible for ensuring that all subjects of potential concern referred to the committee receive timely review and resolution by the Corporate and Plant Management. In addition to these normal responsibilities, the Off-Site Safety Review Committee maintains cognizance over all auditing activities associated with the Safeguards Contingency Plan. All audits involve a verification of compliance and effectiveness of implementation of Federal laws, internal rules and procedures associated with the Safeguards Contingency Plan. 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 audit is completed within a period of 24 months.

Sections 6.5.1.4 and 6.5.1.6 of the Technical Specifications define the meeting frequency and responsibilities of the Plant Operational and Safety Review Committee. The Committee convenes monthly, as a minimum, and is responsible for reviewing changes to the Safeguards Contingency Plan and implementing procedures and recommending changes to the Off-Site Safety Review Committee.

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 Off-Site Safety Review Committee. The Committee convenes every 6 months, as a minimum, and is responsible for reviewing all changes to the Safeguards Contingency Plan referred by the Plant Operational and Safety Review Committee and is responsible for ensuring that an audit of the Safeguards Contingency Plan is completed at a frequency of at least once per 24 months.

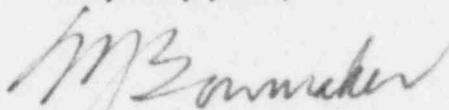
Section 1009, subsection 5.3.1 of the Security Plan Implementation Procedures states that an independent audit of the Calvert Cliffs Security Plan (Contingency Plan) and its implementing procedures will be conducted annually. The report is reviewed by the Off-Site Safety and Review Committee as well as the Plant Operational and Safety Review Committee.

In summary, all changes to the Safeguards Contingency Plan 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. Any subjects of potential concern arising as a result of the Plant Operational and Safety Review Committee review are referred to the Off-Site Safety Review Committee and reviewed within the required frequency.

To alleviate any future misinterpretations of Reference (b), we suggest that Generic Letter 82-23 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 (c).

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

Very truly yours,



N. J. Bowmaker
Vice President
General Services

NJB/EPG/slk

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