

DGS

JUN 21 1994

Docket No. 50-317

Mr. Robert E. Denton
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657 - 4702

Dear Mr. Denton:

Reference: Letter from R. E. Denton to NRC, dated January 18, 1994
NRC TAC No. U00761

In the above reference, Baltimore Gas and Electric (BG&E) requested a change to the Quality Assurance (QA) program for Calvert Cliffs Units 1 and 2. The proposed change added a new exception to the qualification requirement for intermediate supervisors in the craft or discipline supervised. Instead of requiring four years of experience in the craft/discipline designated to be filled, BG&E proposed that a craftsman possessing a minimum of an associates degree with four years of related technical experience and demonstrated supervisory ability, could be appointed an intermediate supervisor. In our opinion, this change would not measurably reduce the overall effectiveness of the QA program, particularly since front line supervisors must still possess four years of experience in the craft or discipline to be supervised.

Approval to employ the proposed change in qualification requirements is hereby granted with the additional requirement that an individual, who is appointed, and whose performance is less than four years experience in the craft/discipline, should be evaluated after one year of service as an intermediate supervisor.

Sincerely,

Original Signed By:

Michael C. Modes, Chief
Materials Section
Division of Reactor Safety

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Mr. Robert E. Denton


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cc w/encl:

G. Detter, Director, Nuclear Regulatory Matters (CCNPP)
R. McLean, Administrator, Nuclear Evaluations
J. Walter, Engineering Division, Public Service Commission of Maryland
K. Burger, Esquire, Maryland People's Counsel
R. Ochs, Maryland Safe Energy Coalition
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Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Maryland (2)

bcc w/encl:

Region I Docket Room (with concurrences)
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R/D/RS
Modes
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6/19/94

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To	Mike Modes	From	Bruce Montgomery
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1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

ROBERT E. DENTON
VICE PRESIDENT
NUCLEAR ENERGY
(410) 260-4455

January 18, 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
Proposed Change to Quality Assurance Program

In accordance with 10 CFR 50.54(a)(3), Baltimore Gas and Electric Company (BG&E) hereby requests approval of a proposed change to the Quality Assurance (QA) Program for Calvert Cliffs Units 1 and 2. The proposed change would add a new exception to the qualification requirements of ANSI N18.1-1971 for personnel serving as intermediate supervisors. Specifically, this proposal would change the requirement for intermediate supervisors to have four years experience in the craft or discipline supervised. The changes to the program are shown on the attached markup from Table 1B-1 (see section entitled ANSI N18.1-1971, new Item 2). Nuclear Regulatory Commission (NRC) approval is required prior to implementation of this change since this change is deemed to constitute a reduction in a QA Program commitment previously accepted by the NRC.

The QA Program contains a commitment to follow the guidance of NRC Regulatory Guide 1.8 (September 1975), which in turn references ANSI N18.1-1971. Baltimore Gas and Electric Company exceptions to this guidance are noted in Table 1B-1 of the QA Program. ANSI N18.1-1971, Paragraphs 3.2.2 and 4.3.2, taken together, require intermediate-level as well as first-line supervisors of repairmen/technicians to have at least four years experience in the craft/discipline supervised. Baltimore Gas and Electric Company has three levels of supervision in its "repairman/technician" organizations: i.e.; Supervisors, Assistant General Supervisors (AGS) (in some cases), and General Supervisors (GS). All of these positions correspond to the positions defined in Paragraph 3.2.2. The AGS and GS are intermediate-level positions. However, we do not believe that all these individuals need to have the four years of craft/discipline experience required by Paragraph 4.3.2. Instead, we propose that as a minimum, first-line supervisors shall possess four years experience in the craft/discipline supervised, while intermediate level supervisors in the "repairman/technician" organization may be selected to fill supervisory positions based on a minimum of four years related academic/technical training or experience, and demonstrated supervisory capability. All first-line and intermediate-level supervisors shall have at least a high school diploma or equivalent.

To illustrate, this change would allow an experienced degreed engineer with supervisory experience in design engineering to fill an intermediate-level supervisory position in maintenance.

Plant operation in accordance with this proposed change would continue to satisfy 10 CFR Part 50, Appendix B, Criterion 1, "Organization." Supervisors with responsibilities for implementing elements of the QA Program will continue to be qualified to carry out their responsibilities. In addition, the proposed change will allow BG&E to provide a balanced and broad base of supervisory

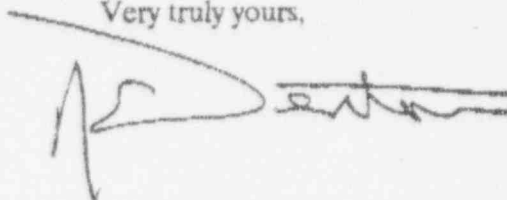
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January 18, 1994
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capability comprised of individuals with extensive craft/discipline experience accrued through field work, and individuals with related education and experience who have demonstrated the ability to effectively supervise.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you. Our contact is Mr. Bruce S. Montgomery, Principal Engineer - Licensing (410-260-4929).

Very truly yours,

A handwritten signature in black ink, appearing to read "Bruce S. Montgomery", written over a horizontal line.

RED/BSM/dlm

Attachment: Markup of BG&E QA Policy, Commitment to ANSI N18.1-1971

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

QUALITY ASSURANCE POLICY

Revision-36 ^{39 40} 37

ANSI N18.1-3/8/71
ITEM 1 (CONT)

Reason

The S-NO will hold or have held an SRO license, as opposed to having a license at the time of appointment to the position. He will have an excellent understanding of plant operations. The GS-NPO will not only hold an SRO license at the time of appointment to the position, but he will maintain the license. The GS-NPO directly supervises the operating shift organization, whereas the S-NO is also responsible for operations procedure development, modifications acceptance, and operations/maintenance coordinations. The S-NO's level of supervision does not require current in-depth and plant specific knowledge which results from maintaining an SRO license.

Item 2 (16)

Requirement

ANSI N18.1-3/8/71 (CONT'D)

NEW

Paragraph 3.2.2 states that supervisors are persons principally responsible for directing the actions of operators, technicians, or repairmen. Those positions usually designated as intermediate and first line supervisors are included in this category.

Paragraph 4.3.2 states that supervisors not requiring Atomic Energy Commission (AEC) licenses shall have a high school diploma or equivalent and a minimum of four years of experience in the craft or discipline he supervises.

Response

Baltimore Gas and Electric has three supervisory positions in its organization - Supervisors, and in some cases Assistant General Supervisors and General Supervisors - which are organizationally equivalent (when supervising technicians/repairmen) to the positions described in paragraph 3.2.2 of ANSI N18.1-3/8/71. All these individuals need not possess the four years of craft/discipline experience required by paragraph 4.3.2. Instead, at least the first line supervisor shall possess four years experience in the craft/discipline he supervises while other supervisors in the organization may be selected to fill supervisory positions based on a minimum of four years related academic/technical training or experience, and demonstrated supervisory ability. Additionally, all first line and intermediate supervisors shall have at least a high school diploma or equivalent.

Reason

To provide a balanced and broad base of supervisory ability within the site organizations made up of technicians/repairmen, it is desirable to include as supervisors both individuals with extensive craft/discipline experience accrued through field work and individuals with related education and experience who have demonstrated the ability to effectively supervise.

ANSI N45.2.1 - 1973

Requirement

Subsection 3.2 outlines requirements for demineralized water.

Response

BG&E specifications for demineralized water are different than the specifications outlined in the standard.