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VICE PRESIDENT  
NUCLEAR ENERGY  
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March 7, 1991

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 Description

Gentlemen:

In accordance with 10 CFR 50.54(a)(3), Baltimore Gas and Electric (BG&E) Company hereby requests approval of a proposed change to the Quality Assurance Program for Calvert Cliffs Unit Nos. 1 & 2. The proposed change would revise Section 1B.11, "Test Control" of the Quality Assurance Policy. We propose to change the program as reflected in the description shown on the attachment. Nuclear Regulatory Commission approval is required prior to implementation of this change since the change constitutes a reduction in the quality assurance program commitments as previously accepted. This portion of the program is also described in the Updated Final Safety Analysis Report (UFSAR), Chapter 1, Appendix B, Section 1B.11, "Test Control." The UFSAR description is updated annually in accordance with 10 CFR 50.71.

The proposed change will relieve the Plant Operations and Safety Review Committee (POSRC) and the Plant General Manager of the burden of reviewing and approving the results of safety related (SR) and certain non-safety related (NSR) tests which are completed with satisfactory results. The current Quality Assurance Policy regarding Test Control states in part:

"With the exception of testing performed as part of receipt inspection and completed surveillance tests performed without malfunctions or out-of-specification data, results of tests are reviewed and evaluated by the POSRC and accepted and approved by the Plant General Manager."

This statement provides an exception to the requirement for POSRC review of test results and subsequent Plant General Manager approval. This exception is provided since the knowledgeable technical personnel and the cognizant management approval authority have previously reviewed the applicable procedures, including the acceptance criteria, and determined them to be acceptable. If the results are not acceptable or there were malfunctions during the test, then the POSRC should review the results and determine their impact on the safety of the plant, if any. However, if the test was performed satisfactorily, there is no benefit gained by additional review of acceptable test results.

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Currently, this exception is limited to surveillance tests only. However, many other categories of test procedures are also prepared and reviewed by knowledgeable technical personnel and approved by cognizant management approval authority. These reviews also provide no added safety benefit if there are no malfunctions and the acceptance criteria are met. Therefore, BG&E proposes to change the above wording to read as follows:

"Results of completed tests on SR and designated NSR structures, systems and components (per Q-List) that identify a malfunction or were out-of-specification are reviewed and evaluated by the POSRC and accepted and approved by the Plant General Manager."

This change to the quality assurance program will ensure POSRC evaluation and Plant General Manager approval of test results which may have an adverse effect on nuclear safety, but will free them of the unnecessary administrative burden of evaluating and approving satisfactory test results. More of the POSRC members' time can thus be devoted to evaluation of safety concerns.

Operation in accordance with the proposed change would continue to satisfy Appendix B of 10 CFR Part 50. Criterion XI requires, in part, that test results be evaluated to assure that test requirements have been satisfied. This evaluation has been, and would continue to be, performed by a qualified responsible individual or group. If the test results are not satisfactory due to malfunction or being outside the specified acceptance criteria, then additional review would be required by the POSRC and the Plant General Manager.

Considering the above information, we conclude that the proposed change to our Quality Assurance Program will maintain the effectiveness of the test results review process. Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

GCC/ERG/erg/dlm

Attachment: Excerpt from Section 1B.11 of the QA Policy

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
R. A. Capra, NRC  
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1B.11 TEST CONTROL

To demonstrate the ability of SR and designated NSR structures, systems, and components to function as designed, they are subjected to a program of surveillance and operational testing. Procedures specify the systematic development, review, approval, and conduct of tests and review of test results. Conditions such as failures, malfunctions, deficiencies, deviations, and non-conformances discovered during testing are documented and evaluated.

Whenever testing is required to demonstrate that SR and designed NSR material, parts, components, or systems will perform satisfactorily in service, a test program is established and procedures are used that have been written and approved in accordance with basic requirements.

Nuclear Engineering Department, and CCNPPD conduct tests to verify that plant behavior conforms to design criteria, ensure that failure and substandard performance are identified and controlled, and demonstrate satisfactory performance after plant modification and maintenance activities.

Written test procedures are developed, reviewed, and approved before testing is performed. They specify instructions for testing, methods of test, test equipment, and instrumentation; and for the following as applicable:

1. Adequate and appropriate equipment.
2. Preparation, condition, and completeness of item to be tested.
3. Suitable and controlled environmental conditions.
4. Mandatory inspection hold-points for witness by BG&E inspection or authorized inspector personnel.
5. Provision for data collection and storage.
6. Acceptance and rejection criteria.
7. Methods of documenting or recording test data and results.
8. Provision for ensuring that test prerequisites have been met.

Test results are documented and evaluated; they are accepted or rejected by a qualified, responsible individual or group.

*Replace with attached INSERT*

With the exception of testing performed as part of receipt inspection and completed surveillance tests performed without malfunctions or out-of-specification data, results of tests are reviewed and evaluated by the POSRC and accepted and approved by the Plant General Manager. Test records are kept in sufficient detail to make possible an evaluation of test results and to show how individual tests demonstrate that SR and designated NSR structures, systems, and components and the plant as a unit can operate safely and as designed. SR and designated NSR test records are retained as plant history records.

Delete the indicated information in the QA Policy, Section 1B.11, page 36, and replace it with the following insert:

\*Results of completed tests on SR and designated NSR structures, systems and components (per Q-List) that identify a malfunction or were out of specification are reviewed and evaluated by the POSRC and accepted and approved by the Plant General Manager.

**Note to Reviewers:** The UFSAR description will be updated by Rev. 11 to reflect the current QA Policy (Rev. 24).