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ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

December 31, 1982

U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

ATTENTION: Mr. Ronald C. Haynes, Director  
Region I

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Systematic Assessment of License Performance (SALP)

REFERENCE: (1) NRC Letter from R. W. Starosteck to A. E. Lundvall, Jr., dated  
December 8, 1982, same subject

Gentlemen:

We believe the SALP meeting of December 14, 1982, provided an excellent forum for effective communication and mutual understanding between our staffs. The revised guidelines for the SALP review process have improved the quality of this SALP report. However, there are three areas of the report on which we desire to comment, as invited by Reference (1).

The first area of clarification involves the statement in the second paragraph of page 23, under Security and Safeguards, "Overall, major issues are well addressed, with lack of correction of poor material performance and deficient security operations unit performance being problem areas." As discussed in detail at the December 14th meeting, we do not believe that the evidence supporting the negative aspects of this statement is sufficient to justify the words "lack of" and "deficient" in your assessment of our overall performance. In fact, we believe that the supporting evidence lacks sufficient substance to reduce the Security and Safeguards area to a Category II rating.

The second area of clarification is the example (near the end of paragraph two on page 25) used to support Board Recommendation number one under Licensing Activities. The Headquarters and plant staffs were both fully involved with the negotiations concerning Appendix I Technical Specifications. The decision to refute previous agreements was made by higher level management only after enough study of the agreements had been completed to produce a meaningful cost-benefit analysis.

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Also under Licensing Activities, are the observations leading to Board Recommendation number two. As pointed out at the SALP meeting, even though 10 CFR 50.59 does not require the submittal of "Safety Analyses" for Technical Specification changes, we feel we have made significant improvements in the quality and depth of our submittals in the past year.

The third area of clarification concerns Table VI. This table lists unplanned Reactor Protective System (RPS) and Engineering Safeguards Features (ESF) actuations. This table gives an erroneous impression of a large number of unplanned actuations. One reason is that actuations on both units are combined into this one table. A second reason is that initiating events that cause actuations in both the RPS and ESF are listed twice. Since these systems are integrated to provide overall protection of the plant, it is not unusual for a single initiating event to cause actuations in both protective systems. In this table, five events are listed twice, for a total of ten items. We suggest that in the future these events be listed only once, but show that actuations occurred in both the RPS and ESF. In addition, we suggest that the listings be separate for each unit.

As requested at the SALP meeting, the corrective actions which have been implemented or are in the process of being implemented regarding the Change Control Process (CCP) are described below.

### STAFFING LEVELS

Prior to this SALP evaluation period, and as early as 1979, several organizational changes were implemented and our staff levels increased to address the rising level of regulatory activity. Changes have added specialized work groups with primary responsibilities in the CCP. Other changes have increased the staff levels of existing work groups with primary responsibilities in the CCP.

### DRAWING & DOCUMENT CONTROL

In September 1981 a Print Verification Task Force was authorized by Company management. This effort, along with the Document Control Task Force is expected to substantially improve the control of plant documentation.

### SAFETY ANALYSES

As a result of weaknesses identified by the NRC Performance Appraisal Branch Inspection published in March 1982, the Electric Engineering Department's procedures controlling safety analyses have been upgraded. Increased training and qualification guides for the engineers responsible for 10 CFR 50.59 evaluations have been provided. Various changes to the review process have been implemented including an OSSRC Subcommittee (Safety Analysis Review) to review each 10 CFR 50.59 safety evaluation and report their findings to the full committee. The subcommittee are OSSRC members, but do not have line responsibility for the generation of the 10 CFR 50.59 safety evaluations. Additional guidance for committee members has been published and a continuing training program is being implemented for them.

### PROCEDURE AND FACILITY CHANGE CONTROLS

We have recently committed to improving our control over certain procedure changes to provide a check against the Final Safety Analysis Report (FSAR) and 10 CFR 50.59. Several changes have been incorporated in our Facility Change Request (FCR) procedure to provide for improved process control; this procedure is currently undergoing review for the purpose of better defining the interface between the headquarters and plant staffs. One of the changes to the FCR process added an FCR Evaluation Committee to gain better management control over priorities. Additionally, a specific training program is being developed for all engineers, journeyman level maintenance personnel, and other selected staff personnel to include FSAR, Technical Specification, Quality Assurance Program and Procedures, and associated plant administrative requirements.

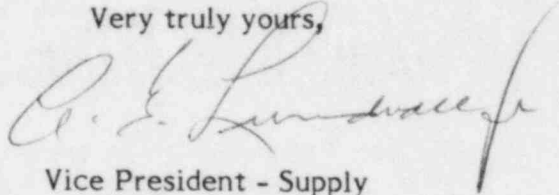
Some of the corrective actions noted above were acknowledged by the SALP report while others were not. We believe that the sum of the our corrective actions significantly strengthen our CCP. Further, the corrective actions still in progress will continue to upgrade the CCP. While some minor weaknesses in our CCP may still exist we believe our actions have been responsive to NRC concerns and Company needs and our efforts to enhance our CCP will continue.

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Overall, the SALP meeting of December 14, 1982, was a productive exchange of perspectives. You can be assured that we will continue to strive for improved performance and safety at the Calvert Cliffs Nuclear Power Plant.

Should you have questions regarding this response, we would be pleased to discuss them with you.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. E. Lundvall".

Vice President - Supply

AEL/RED/gla

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