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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

September 7, 1983

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

Attention: Darrell G. Eisenhut, Director
Division of Licensing

Subject: Calvert Cliffs Nuclear Power Plant
Units No. 1 and 2, Dockets Nos. 50-317 and 50-318
NRC Generic Letter 83-28

- References:
- (a) NRC Generic Letter 83-28; Required Actions Based on Generic Implications of Salem ATWS Events.
 - (b) BG&E letter from Mr. A. E. Lundvall, Jr. to Mr. Ronald C. Haynes dated March 21, 1983 (Response to IE Bulletin 83-04: Failure of the Under-voltage Trip Function of Reactor Trip Breakers).

Gentlemen:

Reference (a) contains the NRC Staff's positions on certain procedural, classification, surveillance, and maintenance activities and requests that licensees assess their conformance with those positions and provide schedules for attaining conformance where deviations are not adequately justifiable. While we have initiated a reevaluation of our present practices and have determined that many of these are satisfactory, we anticipate that we will not have sufficient time or resources to completely assess all of the Staff's positions and to develop the responses requested by Reference (a) within the specified 120-day time frame. We therefore request an extension to February 29, 1984, for submittal of the information requested in Reference (a). This extension will enable us to properly allocate our manpower resources to the subject Generic Letter response, other previously scheduled licensing actions, and our two near-term refueling outages.

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The primary concern stemming from the Salem ATWS events is the capability of Reactor Trip Switchgear to function reliably and the adequacy of plant engineering, maintenance and testing programs to ensure reliability. Calvert Cliffs design features and previously implemented actions to improve and/or demonstrate the adequacy of these programs are described below:

- o The Calvert Cliffs reactor trip system design, which incorporates shunt trip devices in parallel with the undervoltage trip devices, provides adequate assurance that the reactor is capable of achieving a safe shutdown condition within the period assumed in the FSAR.
- o Our response to I&E Bulletin 83-04 (Reference (b)) addressed performance of testing, procurement, classification, maintenance, and operational activities concerning the Undervoltage Trip devices in our Reactor Protective System (RPS). Specifically, this included:
 - Results of breaker response time tests that demonstrate that an RPS trip will result within the design response times assumed in the FSAR.
 - Verification that all electrical and controls testing and maintenance procedures associated with corrective and preventive maintenance activities performed on RPS trip devices conform to manufacturers recommendations.
 - Verification that replacement parts purchased for corrective maintenance activities are procured as safety-related material.
- o Procedural changes have been initiated at Calvert Cliffs to improve surveillance test (STP) and preventive maintenance (PM) programs. We have altered the frequency of our STP and PM programs to check breaker/device operability more often and have incorporated recent Combustion Engineering and General Electric recommendations in response to I&E Bulletin 83-04.
- o Item 1.1 of Reference (a) outlines a program for post-trip review. Administrative controls existed at Calvert Cliffs prior to the Salem ATWS events that required a post-trip review to be conducted by the General Supervisor-Operations to determine the acceptability of restart. As a result of the Salem ATWS events, we have supplemented this post-trip review program to require a detailed, independent review of plant trips by the Operational Licensing & Safety (OL&S) Unit. This unit consists of individuals with engineering degrees and/or operational backgrounds, some of whom hold NRC reactor operator licenses. The independent review provided by the OL&S Unit provides an indepth analysis to determine the significance of events relative to long-term plant operations.

- o Item 2.1 of Reference (a) outlines an equipment classification and vendor interface program. We are currently engaged in an effort involving a review of our equipment classification lists. This review includes reverification that all equipment required to achieve a safe shutdown condition is properly classified.

Our Plant Operational Experience Assessment Committee (POEAC) currently reviews vendor related information and provides recommendations to the Plant Operations and Safety Review Committee (POSRC) regarding facility and/or procedural improvements. Information reviewed by the POEAC includes:

- o Nuclear NOTEPAD Activities (Emergency Hotline Operating Plant Experience, and Significant Event Reports)
- o Calvert Cliffs Events
- o NRC IE Bulletins, Circulars, and Information Notices
- o INPO Significant Operating Experience Reports
- o INPO and NSAC Technical Reports
- o Combustion Engineering Availability Data Program Infobulletins.

Although our current review program may not be as comprehensive with respect to vendor interface as that proposed in Reference (a), we believe that it does provide for adequate reviews of the type of generic information which was identified by the NRC and the industry as being potentially useful in decreasing the likelihood of a Salem-type event as well as other undesirable events.

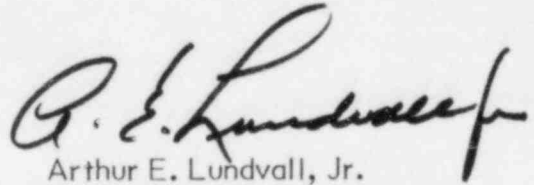
- o Items 3.1 and 4.1 of Reference (a) require verification of the post-maintenance test program for testing the reactor trip system for functionality and operability, and implementation of test guidance and vendor recommended modifications. Changes were made to our STPs and PMs associated with the reactor trip switchgear to incorporate recent guidance from our vendors. These changes address, on an interim basis, the intent of items 3.1 and 4.1 of Reference (a).
- o Items 4.2.1 and 4.2.2. of Reference (a) request information concerning the incorporation of vendor recommendations related to lubrication, housekeeping and periodic maintenance. Certain portions of this information have been previously transmitted in our response to IE Bulletin 83-04 (Reference (b)).

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We believe that the actions we have taken to date, as described above, provide adequate justification to support our request for an extension of the date for providing information requested in Reference (a).

Should you have further questions regarding this matter, please do not hesitate to contact us.

Very truly yours,



Arthur E. Lundvall, Jr.
Vice President-Supply

AEL/LOW/BSM/cm

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