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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

August 3, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. J. R. Miller, Chief
Operating Reactors Branch #3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Calvert Cliffs Nuclear Power Plant
Units Nos. 1 & 2; Dockets Nos. 50-317 and 50-318
Upgraded Emergency Operating Procedures

Reference: 1. BG&E letter from Mr. A. E. Lundvall, Jr. to Mr. J. R. Miller (NRC), dated March 14, 1984.

Gentlemen:

In your letter dated June 14, 1984, you acknowledged receipt of Reference (1) and indicated that our submittal omitted the plant-specific technical guidelines which were required by Supplement 1 to NUREG-0737. Accordingly, you requested that we provide the following information to allow you to complete your review of the Procedures Generation Package:

(1) A description of the process used to determine the applicability of the actions specified in the referenced generic technical guidelines to your plant. This description should include a discussion of how the engineering evaluation or analysis, at the specific operator action step level, was performed to modify the generic guidelines to apply them to Calvert Cliffs Units 1 and 2.

(2) If the process described in item 1 identifies any safety significant deviations from, or additions to the generic technical guidelines (because of different plant equipment operating characteristics or design), the submittal should: (a) describe the evaluation performed to determine the safety significance of the deviations, (b) identify the safety significant deviations or additions found, and (c) provide the technical justification (i.e., engineering evaluation or analysis, as appropriate) for the plant-specific approach.

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On July 16, 1984, we met with representatives of the NRC Procedures and Systems Review Branch (PSRB) to describe the process used for developing plant-specific procedures from the Combustion Engineering generic guidelines and for establishing the acceptability of any deviations from the operator actions specified in those guidelines. This letter documents our understanding of the agreements reached during the July 16, 1984, meeting and formally responds to your June 14, 1984, request for additional information.

The Calvert Cliffs Procedures Generation Package does not contain a document entitled "Plant-Specific Technical Guidelines" because we have included information pertinent to such a document in our Emergency Operating Procedure Writer's Guide (CCI-310). Supplement 1 to NUREG-0737 states that the purpose of the plant-specific technical guidelines is to describe the planned method for developing plant-specific emergency operating procedures from the generic guidelines. Section IV of our Writer's Guide, "Translation of Emergency Guidelines into Plant-Specific Emergency Operating Procedures," satisfies this objective. Our Writer's Guide describes the stepwise process which is being followed to adapt the Combustion Engineering Emergency Procedure Guidelines (CEN-152) to Calvert Cliffs at the specific operator action level. An outline of this stepwise process is provided in Attachment 1. Our decision to incorporate this information into the Writer's Guide was based on a preference towards consolidation of all instructions and guidance governing the development of the upgraded procedures into a single administratively controlled document.

As discussed during the meeting, Calvert Cliffs served as Combustion Engineering's "source" plant for the model upon which the generic guidelines are based. Consequently, we expect that our upgraded emergency operating procedures will contain relatively few deviations from the generic guidelines. These deviations would result either from minor design or design basis differences, specific preferences in system operation, or from what we see as an opportunity to make basic procedural improvements that would further enhance the likelihood of prompt recovery from an emergency condition.

Deviations from the generic guidelines will be identified while writing the procedure drafts. Our plans provide for the use of engineering evaluation and/or analysis to determine the adequacy of these proposed deviations. The level of detail required for these assessments will be dependent upon the degree and nature of departure from the generic guidelines and the deviation's perceived safety significance. Pursuant to the agreements reached at the July 16, 1984, meeting we will submit, for your information and review, any deviations that we have determined to be safety-significant. This submittal will include a description of the engineering assessment performed to support each deviation and will be provided at least three months prior to the commencement of formal operator training on the affected procedures. This agreement is consistent with the regulatory position set forth in Item I.C.1 of NUREG-0737 which appears to be based upon your concern that changes to generic guidelines could constitute an unreviewed safety question under 10 CFR 50.59 and thus may require prior staff approval.

As you are undoubtedly aware, our operating license requires a pre-implementation review of procedure revisions by our Plant Operations and Safety Review Committee to determine whether a change constitutes an unreviewed safety question (refer to Calvert Cliffs Technical Specifications, Section 6.5.1.6). In accordance with 10 CFR 50.59, the Company must request prior NRC approval of any proposed change that is determined to involve an unreviewed safety question. In our view, your use of the term "safety-significant" implies a broader set of deviations than that defined by 10 CFR

50.59 in that the NRC Staff is requesting the review of changes which **may** involve an unreviewed safety question.

In the spirit of successfully resolving Item I.C.1 of NUREG-0737, we are willing to provide the requested information during the procedure development phase. After the new procedures have been implemented, however, our practices will be governed by the administrative provisions of our license in that only those future deviations or changes that are determined by our POSRC to involve an unreviewed safety question will be forwarded for prior NRC approval.

The above information constitutes our response to your June 14, 1984, letter. Our meeting on July 16, 1984, was very helpful in ensuring a clear understanding of the regulatory requirements applicable to this issue. We appreciate the time and attention of the staff members involved.

If you should have any questions concerning these matters, please do not hesitate to contact us.

Very truly yours,

Arthur E. Lundvall Jr.

AEL/BSM/vf

Attachment

cc: D. A. Brune, Esq.
G. F. Trowbridge, Esq.
Mr. D. H. Jaffe, NRC
Mr. T. Foley, NRC
Mr. W. G. Kennedy, NRC
Mr. V. A. DeLiso, NRC
Mr. J. Lyons, NRC
Mr. R. R. Mills, CE
Mr. J. C. Ventura, Bechtel

PLANT-SPECIFIC TECHNICAL GUIDELINES:

Outline of Process for Developing
Emergency Procedure Guidelines
(Section IV of Writer's Guide, CCI-310)

The Calvert Cliffs Emergency Operating Procedures contain the following sections:

Scope
Initial Indication
Precautions
Immediate Actions
Recovery Actions/Safety Function Status Check
Discussion

Plant-specific input to each section will be developed as follows:

I. SCOPE

1. Using source documents (Attachment 7 of Writer's Guide) establish plant specific entry and exit conditions.

2. Characterize event using source documents (e.g., inside/outside containment, small/ large LOCA).

3. Compare steps 1 and 2 with generic guidelines to establish common starting point.

4. Identify deviations from generic guidelines.

5. Document deviations on Attachment 5 of Writer's Guide.

II. INITIAL INDICATION

1. Prepare list of plant specific indications for event being addressed.

2. Compare generic indications with available plant specific indications to ensure complete list.

3. Select four or five typical indications for inclusion in this section. Retain remaining indications for discussion section.

III. PRECAUTIONS

1. Identify safety concern from generic guideline.
2. Construct general precaution, precaution, and caution as applicable.
3. Review source documents for additional safety concerns.
4. Repeat step 2 as applicable.
5. Perform steps 4 and 5 from Section I.

IV. IMMEDIATE ACTIONS

1. Rewrite in plant-specific format.
2. Insert plant-specific capabilities as determined from source documents.
3. Perform steps 4 and 5 from Section I.

V. RECOVERY ACTIONS

1. Use characterization from Section I to prioritize safety functions in order of risk to the function
2. Identify the safety function addressed by each generic guideline step in each success path.
3. For the safety function at greatest risk (from Step 1, above) provide event-specific guidance for restoration (as obtained from generic guidelines).
4. Identify alternate and extraordinary success paths for this function and include in the event-specific recovery actions, if appropriate (some alternate and extraordinary success paths would be more appropriate for inclusion in the functional recovery guide).
5. Repeat the process described in steps 3 and 4 for each safety function.
6. Perform steps 4 and 5 from Section I.

VI. SAFETY FUNCTION STATUS CHECK

1. Using scope definition and data from recovery actions, establish appropriate safety function values for safety function checks.

2. Perform steps 4 and 5 from Section I.

Upon completion of these sections complete the following steps:

1. Resolve deviations from the generic guidelines using source documents or additional engineering analysis.

2. Document deviation resolutions on Attachment 5 to Writer's Guide.

3. Document the basis for each procedure step in Section 6, Discussion.

4. Identify deviations which are safety-significant and require NRC review.