



1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

GEORGE C. CREEL
VICE PRESIDENT
NUCLEAR ENERGY
(410) 260-4455

March 4, 1992

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
Notice of Violation Corrective Action Due Date Extension

REFERENCE: (a) Letter from Mr. G. C. Creel (BG&E) to Document Control Room (NRC), Reply to NRC Inspection Report 50-317/89-27; 50-318/89-28, dated March 9, 1990

Gentlemen:

This letter is to advise you of a revised corrective-action schedule regarding cable-separation deficiencies identified in Combined Resident Inspection Report Nos. 50-317/89-27 and 50-318/89-28.

In Reference (a), we described our plan to complete corrective action by the end of each Unit's respective refueling outage (Unit 2, 1991, and Unit 1, 1992). All cable trays outside of the Cable Spreading Rooms (CSRs) have been corrected. Our original estimate was based on walkdowns during the first quarter of 1990. We knew we would be working with materials containing asbestos, but did not expect to release significant quantities. While working in the Unit 1 and 2 CSRs, we discovered unacceptable airborne-asbestos levels. Asbestos work requires significant controls to ensure worker safety. These requirements include extensive pre-job planning, respirator use, filtered ventilation, and protective clothing.

Extensive work in a CSR requires Unit shutdown because of concerns for potential plant trip and the creation of limited access to vital plant equipment. The CSR contains vital A.C. power-distribution and Control Element Assembly equipment. The potential loss of this equipment at power is unacceptable. Additionally, asbestos contamination of the control room atmosphere is possible because of shared ventilation. We will redirect ventilation to prevent this, but performing the work with one unit shutdown reduces our concern.

We have revised the work schedule appropriately, taking personnel safety precautions into consideration. Based on work already completed, we expect the job will require two outages per unit to perform; work will therefore be completed by the end of Unit 1 cycle 12 and Unit 2 cycle 10 refueling outages.

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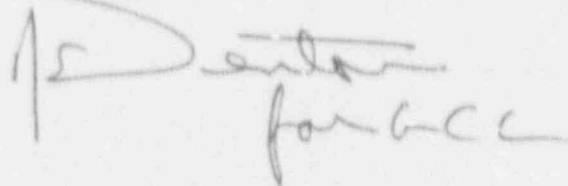
We have evaluated this extension as not posing a threat to safe operation. This is based on the following:

- ♦ cables serving safe-shutdown equipment are not affected,
- ♦ there are no high-energy ignition sources in CSR cable trays,
- ♦ circuit-protection devices are designed to clear cable faults prior to cable ignition,
- ♦ the CSR is protected by a halon flooding system,
- ♦ deficient cable-separation barriers will not prevent safety-function accomplishment,
- ♦ all cabling not meeting I.E.E.E. SC-6.5 separation-distance recommendations for low voltage power, control and instrumentation cabling was modified to meet the UFSAR criteria -- the CSR cable trays satisfy these I.E.E.E. recommended distances.

The remaining work will bring the CSR configurations up to the UFSAR requirements. This will consist of removing broken and insufficient tray covers and any asbestos-laden Marinite. Metal tray covers will be installed to satisfy separation requirements. Asbestos-free Marinite will be used where space limitations prevent use of metal tray covers.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



GCC/REF/ref/bjd

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. J. McLean, DNR
J. H. Walter, PSC