

APR 30 1992

Docket Nos 50-317
50-318

License Nos. DPR-53
DPR-69

Mr. George C. Creel
Vice President, Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
MD Rts 2 & 4, P.O. Box 1535
Lusby, Maryland 20657

Dear Mr. Creel:

SUBJECT: EMERGENCY PREPAREDNESS MEETING

This letter and enclosures summarize the April 17, 1992 management meeting held between Mr. L. B. Russell and other members of your staff and members of the NRC Region I staff in King of Prussia, Pennsylvania. The purpose of the meeting was to discuss your emergency preparedness program and implementation of changes resulting from findings identified in NRC Inspection Report 50-317/92-06; 50-318/92-06. Enclosed, for record purposes, is a meeting summary with specific items discussed and a copy of your agenda.

We believe the meeting was beneficial to our understanding of your proposed resolutions to each item. We expect to work with your staff and follow-up on these areas as part of the routine NRC inspection program.

We understand that you plan to commit, in writing, to the planned change implementation dates involved. If our understanding is incorrect, please contact me or Ebe McCabe of my staff.

Thank you for being responsive to our concerns.

Sincerely,
Original Signed By:
James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation
and Safeguards

Enclosures: 2 Stated

<i>C26</i> Gordon	<i>McCabe</i> McCabe	<i>Joyner</i> Joyner
4/28/92	4/28/92	4/28/92

Official Record Copy

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Baltimore Gas and Electric
Company

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cc w/encls:

G. Detter, Director, Nuclear Regulatory Matters (CCNPP)
R. McLearn, Administrator, Nuclear Evaluations
J. Walter, Engineering Division, Public Service Commission of Maryland
K. Burger, Esquire, Maryland People's Counsel
R. Ochs, Maryland Safe Energy Coalition
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Maryland (2)
K. Abraham, PAO (2)

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bcc w/encls:

Region I Docket Room (with concurrences)

Management Assistant, DRMA (w/o encl)

W. Lanning, DRS

J. Joyner, DRSS

C. Cowgill, DRP

J. Yerokun, DRP

L. Nicholson, DRP

S. Greenlee, DRP

P. Wilson, SRI - Calvert Cliffs

R. Lobel, OEDO

R. Capra, NRR

D. McDonald, NRR

DRS SALP Coordinator

DRSS SALP Coordinator

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EMERGENCY PREPAREDNESS MEETING

Licensee: Baltimore Gas & Electric Company
Facility: Calvert Cliffs Nuclear Power Plant
Docket Nos.: 50-317 and 50-318
Date: April 17, 1992
Subject: Discussion of Findings identified in Inspection Report Nos. 50-317/92-06 & 50-318/92-06

Attendees:

NRC: J. Durr, Acting Deputy Director, DRSS
J. Joyner, Chief, Facilities Radiological Safety and Safeguards Branch, DRSS
E. McCabe, Chief, Emergency Preparedness Section, DRSS
L. Nicholson, Chief, Reactor Projects Section 1A, DRP
C. Gordon, Senior EP Specialist, DRSS
D. McDonald, Project Manager, NRR
L. Eckert, EP Specialist, DRSS

BGE: L. Russell, Manager, Nuclear Safety and Planning
T. Forgette, Supervisor, Nuclear Planning Unit
R. Franke, Compliance Engineer

State of Maryland: R. McLean, Administrator, Nuclear Evaluation.

Areas of Discussion:

- Implementation of new Emergency Response Plan Implementing Procedures
- Revisions to the Emergency Action Level (EAL) scheme
- Training of Emergency Directors on prompt classification of events
- Event notification- follow-up to offsite authorities
- Review of emergency classifications contained in operator qualification examinations



**CALVERT CLIFFS NUCLEAR POWER PLANT
EMERGENCY PLANNING UNIT**

**EMERGENCY PREPAREDNESS PROGRAM
INSPECTION**

Nos. 50-317/92-06 and 50-318/92-06

MANAGEMENT MEETING

with the

Nuclear Regulatory Commission, Region 1

Friday, Apr 17, 1992

CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY PLANNING UNIT

Emergency Preparedness Program Inspection Management Meeting

Friday, April 17, 1992

10:00 a.m.	Personnel introduction and introductory remarks	L. B. Russell
10:05 a.m.	Overview: Background Discussion process	T. E. Forgette
10:10 a.m.	Emergency Preparedness Program Inspection Nos. 50-317/92-06 and 50-318/92-06 discussion	T. E. Forgette
11:10 a.m.	Discussion summary and adjournment	L. B. Russell

CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY PLANNING UNIT

- CONSIDERATIONS -

1. Means of assuring proper implementation of new Emergency Response Plan Implementation Procedures (Report Detail 2.1)
2. Specificity of Emergency Action Level (EAL) parameters (Report Detail 2.5.1)
3. Prompt classification of severe accident conditions (Report Detail 2.5.1)
4. Assuring timely off-site notifications of radioactive releases (Report Detail 2.5.3)
5. Adequacy of facility training scenarios for assuring proper EAL classifications (Report Detail 2.5.3)



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- CONSIDERATIONS -

1. Means of assuring proper implementation of new
Emergency Response Plan Implementation Procedures
(Report Detail 2.1)



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- ERPIP PROCESSING -

- ERPIP (new/revision) originated in EPU
- User review and comment resolution
- Validation
 - critique (user/EPU)
 - drill use (user/evaluation team)
 - waik-through (user/EPU)
- Training
 - none/required reading/formal training
- Approval
- Issue
 - copy to each user



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

EMERGENCY RESPONSE PLAN IMPLEMENTATION PROCEDURE TRAINING

- Formal training on new ERPIPs will be provided prior to implementation.

Effective: April 15, 1992, SOP-5, Revision 6

- Input on training needs will be solicited from ERPIP users during review process for new and revised procedures.

Action: revise ERPIP 900
 revise SOP-5

Estimated completion: June 30, 1992



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- CONSIDERATIONS -

2. Specificity of Emergency Action Level (EAL) parameters
(report detail 2.5.1)

3. Prompt classification of severe accident conditions
(report detail 2.5.1)

CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- EAL CRITERIA -

- EALs shall address NUREG-0654 examples
- EALs shall be based on one or more of the following:
 - instrument readings
 - equipment status indicators
 - measurable parameters
 - discrete, observable events
 - entry into certain EOPs/AOPs
 - analysis results (i.e., core damage)
- EAL scheme shall result in minimum user interpretation
- EAL scheme shall result in prompt, consistent emergency class determinations

CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- EAL REVIEW -

- O Preliminary review of Attachment 1, ERPIP 3.0, Rev. 17, EAL Criteria

- O Fifteen EALs have been identified as needing additional study to improve specificity
 - General Emergency (Three)
 - Site Emergency (Four)
 - Alert (Seven)
 - Unusual Event (One)

CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- EAL REVISION PROCESS -

- Assess EALs against the EAL criteria
- Develop EALs to meet EAL criteria
- Technical review
- Validate EALs on simulator with operations shift crew
- Plant Safety Committee review
- NRC approval/State approval
- Training
- Implementation
- Ongoing self-assessment of EAL effectiveness



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- INTERIM MEASURES -

- April - May - Identify concerns regarding shift crew's ability to classify fast breaking events.
- June - Develop performance measures and training that will address concerns
- July - Conduct training during Operations training cycle for all interim-Site Emergency Coordinators (I-SEC's)

CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- EAL CORRECTIVE ACTION -

- Decision
 - Revise existing EAL scheme (NUREG-0654)
 - OR -
 - Develop new EAL scheme (draft Reg. Guide 1.101)

- Schedule
 - May - State/County meeting
 - Proceed with EAL revision subsequent to meeting outcome

Emergency Action Levels Basis

SITE EMERGENCY

A. Class Description

NUREG-0654	Emergency Response Plan	Basis/Comment
<p>Events are in process or have occurred which involve an actual or likely major failures of plant functions needed for protection of the public. Any releases not expected to exceed EPA Protective Action Guideline exposure levels except near site boundary.</p>	<p>Condition where events are in progress or have occurred involving an actual or likely major failure of plant functions needed for public protection. Any releases are not expected to exceed EPA Protective Action Guide exposure levels near site boundary.</p>	

B. Initiating Conditions

NUREG-0654	ERPIP 3.0 Immediate Actions	Basis/Comment
<p>1. Known loss of coolant accident greater than makeup pump capacity.</p>	<p>EOP-8, Functional Recovery Procedure, implemented and one or more EOP-8 safety functions not met.</p>	<p>For LOCA to reach SE level then EOP-5, <u>LOCA</u>, Safety Function Criteria must have been exceeded AND EOP-8, <u>Functional Recovery Procedure</u> implementation must be warranted AND one or more EOP-8 safety functions must not have been achieved. Otherwise the SE class description is not satisfied.</p>



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- TENTATIVE EAL REVISION SCHEDULES -

<u>NUREG-0654</u>		<u>Draft R.G. 1.10i</u>	
May	- State/County meeting	May	- State/County meeting
June - Oct.	- EAL development	-	- Contract award
November	- Technical review	-	- EAL development
Dec. - Jan.	- Validation/PORSC review	-	- Technical review
February, 93	- State/NRC approval	-	- Validation/POSRC review
March - April	- Training cycle 1	-	- State/NRC approval
May - June	- Training cycle 2	-	- Training
July	- Implementation	December, 93 -	- Implementation



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- CONSIDERATIONS -

4. Assuring timely offsite notifications of radioactive releases (report detail 2.5.3)



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- FOLLOW-UP NOTIFICATIONS -

- o Follow-up notification forms and form use are being assessed.
Form was used during a March 18, 1992 Unusual Event
- o SEC procedure, ERPIP 501, Rev. 1 completed
(March 25, 1992)
- o Action: Revise Interim-SEC procedures
Estimated completion: August 1, 1992



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- CONSIDERATIONS -

5. Adequacy of facility training scenarios for assuring proper EAL classifications (report detail 2.5.3)

CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

1. EPU/Operations Training coordination
Action: Revise EPU procedure (SOP-5)
Revise Requalification Training Unit procedure
Estimated completion: SOP-5, Revision 6 complete
Requalification Training procedure
June 1, 1992
2. Complete review of Operating Exams for the Simulator (20 of 27 done to date)
Estimated completion: June 1, 1992
3. Ongoing review of Static Simulator Exams and Licensed Operator Written Exam Bank questions as they are revised
Action: Revise Requalification Training Unit procedures
Estimated completion: June 1, 1992



CALVERT CLIFFS NUCLEAR POWER PLANT EMERGENCY RESPONSE PLAN

- CONSIDERATIONS SUMMARY -

1. ERPIP Training:
Formal training on new ERPIPs
Effective 4-15-92
2. & 3. EAL's:
Interim measures completed by August 1, 1992
Revise existing scheme or incorporate R.G.1.101
4. Follow-up notifications:
Revise interim-SEC procedure by 8-1-92
5. Training Scenarios:
Enhance interface between Units through procedural control of reviews by June 1, 1992. Complete review by simulator scenarios by June 1, 1992.