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August 23, 1984

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

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

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. Thomas T. Martin, Director
Division of Engineering & Technical Programs

Gentlemen:

The routine safety inspection transmitted by Inspection Report 50-317/84-16; 50-318/84-16, identified one item of apparent noncompliance with NRC Regulations. The apparent noncompliance concerned the control of informal punchlists used as an administrative mechanism for tracking outstanding items associated with our Auxiliary Feedwater System modifications project. A thorough review of our current Modifications Control system indicates that it adequately addresses the criteria of 10 CFR 50, Appendix B.

Calvert Cliffs Instruction (CCI)-126, Administrative Control of Facility Change Requests, meets the requirements of 10 CFR 50, Appendix B, Criterion V by providing the controlling procedures for accomplishing activities involving the modification of safety-related systems. These controls are structured to recognize the fact that certain identified deficiencies have an insignificant effect on the operability of a system in its post-modified state.

CCI-126 meets the goals specified in 10 CFR 50, Appendix B, Criterion V in the following manner.

- A. Prior to turning a modified system over to the Operations organization the following actions are taken.
 1. Any outstanding Maintenance Requests generated against the modification that could affect the operability of the system are verified to be complete.
 2. All post-modification testing, (e.g., Pre-Operational Tests, Technical Support Procedures, Functional Tests, Local Leak Rate Tests, Hydrostatic Pressure Tests), is verified to be complete as these tests relate to an adequate demonstration of operability and acceptability of results.
 3. All critical drawings (Control Room P&ID's) are verified to reflect the "As-Built" configuration.

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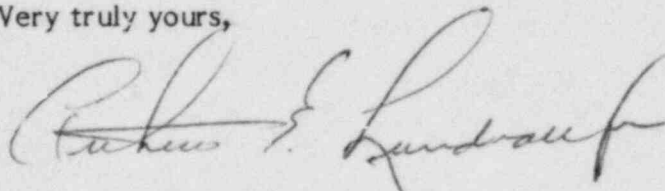
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4. All modifications involving changes to the Technical Specifications are verified to have been completed, reviewed, and approved by the NRC.
 5. All changes affecting the Operating Instructions, Operating Procedures, and Training are identified such that appropriate revisions can be made.
- B. Prior to final closeout of the Facility Change Request (FCR) documentation the following actions are taken.
1. All outstanding Maintenance Requests generated against the modification are verified to be complete. These Maintenance Requests typically involve deficiencies, (such as retermination/repair or painting, etc., of equipment) that do not affect the safety-related function of the modified system. In this way, deficiencies requiring maintenance actions are tracked to completion prior to final closeout of the Facility Change Request documentation.
 2. Attachments to CCI-126 identified as checklists for documenting completed actions are verified completed by Responsible Engineers assigned to each FCR. These attachments are used to document, as an example, the following actions: spare part orders, revisions to Functional Test Procedures, Surveillance Test Procedures, Technical Manuals, Calvert Cliffs Instructions, Preventive Maintenance Procedures, Fire Strategy Procedures, the Instrument Index, etc.

We believe that the formal controls currently implemented by CCI-126 provide adequate assurance that important activities involving modifications to safety-related equipment are accomplished. We perceive no benefit in formalizing an administrative mechanism which is used infrequently to track non-significant deficiencies. We, therefore, request that you consider the issuance of the subject item of noncompliance.

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

Very truly yours,



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cc: D. A. Brune, Esquire
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