



1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

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June 12, 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  
Proposed Change to Quality Assurance Program

Gentlemen:

In accordance with 10 CFR 50.54(a)(3), Baltimore Gas and Electric Company (BG&E) hereby requests approval of a proposed change to the Quality Assurance (QA) Program for Calvert Cliffs Nuclear Power Plant Unit Nos. 1 and 2. The proposed change would revise Section 1B.1, Corporate Organization and Specific Responsibilities pages 5 and 9 of 55, of the Quality Assurance Policy. We propose to change the program as reflected in the description shown on the attachment. Nuclear Regulatory Commission approval is required prior to implementation of this change since the change can be viewed as constituting a reduction in the quality assurance program commitments as previously accepted. This portion of the program is also described in the Updated Final Safety Analysis Report (UFSAR), Chapter 1B, Section 1, and Chapter 12, Section 5. The UFSAR will be revised as part of the annual update.

The proposed change will give the Industry Operating Experience Review (IOER) Unit the responsibility for evaluating industry events for their applicability at Calvert Cliffs and dissolve the Plant Operating Experience Assessment Committee (POEAC) which currently has that responsibility. The IOER Unit members have a diverse background in nuclear energy production related fields. They will work full time on evaluating industry events to provide better ownership and a more focussed review of individual issues. This change is designed to improve our review of Industry Operating Experience and was described in the BG&E Performance Improvement Plan, which has been provided to the NRC for review. Issues identified will be processed using Issue Reports which are part of a corrective action system at Calvert Cliffs. For the past year, IOER has screened industry information and presented their results to POEAC. Their results have demonstrated that IOER can effectively identify and coordinate required responses without committee review. Their results have also demonstrated an improved timeliness in action.

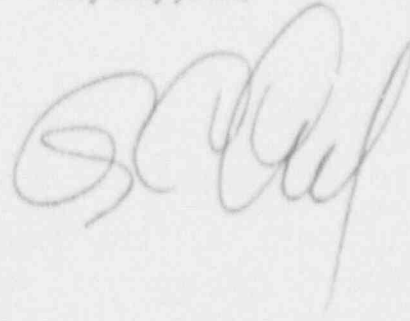
Considering the above information, we conclude that the proposed change to our Quality Assurance Program will increase the effectiveness of the process for evaluating industry events for their applicability at Calvert Cliffs. Plant operation in accordance with the proposed change would continue to satisfy the requirements of 10 CFR Part 50, Appendix B. The Calvert Cliffs Off-Site Safety Review Committee reviewed this proposed change and on May 28, 1992 and determined that

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the proposed change does not constitute a significant safety hazard. Because substitution of the full-time IOER Unit for the current committee method of handling industry operating event evaluation could be considered a reduction in the quality assurance program commitments as previously accepted, NRC approval is requested. Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



GCC/JV/jv/bjd

Attachment: Markup of QA Policy, Revision 28

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

Corporate Organization and Specific Responsibilities

The Corporate Organization Chart of the Baltimore Gas and Electric Company (BG&E) is shown in Figure 1B-1. Persons responsible for the principal elements of the Company's Quality Assurance (QA) Program are as follows: (1)

- Chairman of the Board
- Vice Chairman
- Vice President-Nuclear Energy Division (NED)
- Plant General Manager-Calvert Cliffs Nuclear Power Plant Department (CCNPPD)
- Manager-Nuclear Engineering Department (NED)
- Manager-Nuclear Quality Assurance Department (NQAD)
- Manager-Nuclear Safety & Planning Department (NSPD)
- Manager-Nuclear Support Services Department (NSSD)
- Manager-Nuclear Outage & Project Management Department (NOPMD)

In addition to these individuals, the Vice Presidents of the Fossil Energy Division (FED), Electric Interconnection and Transmission Division (EITD), General Services Division (GSD), and the Management Services Division (MSD), as well as the Managers of the Electric Test Department (ETD), Purchasing & Materials Management Department (PMMD), Information Systems Department (ISD), Generation Maintenance Department (GMD), Fossil Engineering Department (FFD), and the Safety and Medical Services Department (SMSD) are assigned support responsibilities. (1) The above Managers constitute the Nuclear Program Managers who are assigned responsibilities within the QA Program.

Also, two advisory groups perform quality-related functions for plant operations. These are the Plant Operations and Safety Review Committee (POSRC) and the Off-Site Safety Review Committee (OSSRC) whose makeup and responsibilities are described in the TSs for CCNPP.

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~~A subcommittee of the POSRC, the Plant Operating Experience Assessment Committee (POEAC), reviews the operating experience of CCNPP and other plants of similar design to determine the applicability of significant events to CCNPP.~~

Chairman of the Board and Vice Chairman of the Company

BG&E's QA Program for nuclear power plants is established under the authority of the Chairman of the Board and the Vice Chairman of the Company, who are responsible for establishing the overall QA Policy. They assign project responsibilities to the organizations shown in heavy-lined boxes in Figure 1B-1. (1)

The Chairman of the Board assigns authority through the Vice Chairman to the Vice President-Nuclear Energy Division. Primary responsibilities for developing, implementing, and maintaining the QA Program are assigned to Department Managers by the Vice President-Nuclear Energy Division. Managers delegate their authority as required to implement their responsibilities. (1)

Development and integration of programs necessary to operate Calvert Cliffs Nuclear Power Plant up to and beyond its current licensed lifetime; reliability engineering; and documentation and maintenance of plant design bases.

#### Manager-Nuclear Outage and Project Management Department

The Manager-NOPMD is responsible for directing the efforts of personnel and providing resources necessary to support site integrated scheduling, outage management and project management for assigned projects. The organization of NOPMD is shown in Chapter 12 of the UFSAR. The Manager-NOPMD delegates responsibilities for accomplishing the following activities:

- Developing, implementing and maintaining a site integrated schedule which schedules all significant plant related activities at CCNPP.
- Managing the planning, scheduling and performing of all outages at CCNPP.
- Providing overall project management for engineering, procurement, construction and testing of nuclear power plant modification for CCNPP.

#### Manager-Nuclear Safety and Planning Department

The Manager-NSPD is responsible for directing licensing activities, independent safety evaluation activities, strategic planning and emergency planning.

The organization of NSPD is shown in Chapter 12 of the UFSAR. The Manager-NSPD delegates responsibilities for accomplishing the following activities:

• Providing licensing services including preparation and review of nuclear safety, accident and transient analysis; coordination and operation of various industry information exchange systems; evaluation of plant events and conditions adverse to quality for reportability to the NRC and other agencies, assisting in the investigation and evaluation of events, and preparation of the reports; coordination of tracking and resolution of company commitments to the NRC; research and preparation of responses to NRC letters, bulletins, circulars and information notices; UFSAR research and revision control; maintenance and revision of the current licensing basis for nuclear power plants; coordination of all compliance-related communications with external agencies including assistance in ensuring their consistency with existing licensing basis commitments; and coordination of regulatory inspections and visits and company presentations to the NRC.

• Directing investigations of significant events to determine root cause, recommending corrective action, and generating appropriate reports to document the investigation results; directing a program for identifying trends within the corrective action systems.

• Directing the efforts of BG&E personnel involved in emergency planning activities.

• Development of the annual Strategic plan for the Nuclear Energy Division including the Nuclear Program Plan.

• Directing the efforts of personnel under the Nuclear QA Program to develop, implement and coordinate the industrial safety and fire protection program for the CCNPP, and to plan, schedule, and monitor activities directly related to safety, fire protection, and prevention.

• Directing reviews of the operating experience of other plants of similar design to determine the applicability of significant events with respect to CCNPP. (12.)

ADD/INSERT

ATTACHMENT A

BASES FOR QA POLICY REVISIONS (1)

<u>Entry No.</u>	<u>PRF-Q No.</u>	<u>Bases for Revision(s)</u>
1.	<u>771</u>	<u>Procedure Upgrade Action Plan (PUAP), per L.B. Russell letter 1-20-89.</u>
2.	<u>783</u>	<u>10 CFR Part 21 requirements.</u>
3.	<u>797</u>	<u>NRC Inspection #89-16/89-17 (Letter from R. E. Denton to R. P. Heibel dated July 13, 1989.)</u>
4.	<u>824</u>	<u>NRC letter from M. W. Hodges to G. C. Creel dated March 13, 1990.</u>
5.	<u>844</u>	<u>Procurement Program Project upgrade, Performance Improvement Plan (PIP) Action Plan #5.3.1 and QAU Audit Finding 87-13-01</u>
6.	<u>844</u>	<u>1B.15 and 1B.16 revised to clearly establish program applicability and controls, consistent terminology, organizational responsibilities and focused approach towards developing and implementing an integrated Management System.</u>
7.	<u>891</u>	<u>PIP Action Plan 5.3.1 Follow-On Activity.</u>
8.	<u>894</u>	<u>1B.15 and 1B.16 revised to clarify requirements which will permit implementation of the Issues Management System - PIP item 4.10.0.</u>
9.	<u>854/907</u>	<u>G. C. Creel letter to the NRC dated 7/26/91 which discussed modifications to, and acceptance of, changes to the QA Policy involving QA compliance reviews of QAPs and Directives.</u>
10.	<u>815</u>	<u>G. C. Creel letter to the NRC dated 10/3/90 discussing temporary changes not affecting "Approved Procedure Intent" and the relieving of the Administrative Burden on Shift Supervisors.</u>
11.	<u>887</u>	<u>Audit Finding No. 9026-01 (Implementation of Surveillance Requirements).</u>
12.	<u>953</u>	<u>PIP IMPLEMENTATION SECTION 4.1 AND NUREG -</u>
<del>13</del>		<u>ACTION PLAN</u> <u>0737 (TMC ACTION PLAN REQUIREMENTS) ITEM I.C. 5,</u> <u>"PROCEDURE FOR FERRAING OF OPERATING EXPERIENCE</u> <u>TO PLANT STAFF".</u>