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GEORGE C. CREEL  
VICE PRESIDENT  
NUCLEAR ENERGY  
(410) 260-6455

July 13, 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  
Clarification of Proposed Change to Quality Assurance Program

REFERENCE: (a) Letter from Mr. G. C. Creel (BG&E) to NRC Document Control Desk, dated June 24, 1992, Proposed Change to Quality Assurance Program

Gentlemen:

In Reference (a), Baltimore Gas and Electric Company (BG&E) requested NRC approval of a proposed revision of the Quality Assurance (QA) Program for the Calvert Cliffs Nuclear Power Plant. The revision would clarify the regulatory controls that apply to changes to licensing documents. We proposed to add the following words to Section 1B.2 of the QA Policy (see proposed Insert B in Reference a):

"QA Policy revisions are reviewed by NQAD personnel to determine if they constitute a reduction in commitments previously made to the NRC. If so, the revisions are sent to the NRC for approval prior to further internal review."  
(emphasis added)

On July 2, 1992, we were contacted by the NRC reviewer for this request, Mr. John Caruso of NRC Region I. Mr. Caruso requested clarification on the meaning of the phrase "prior to further internal review." We explained that this phrase only denoted final review of the overall revision package by the Manager, Nuclear Quality Assurance Department (NQAD) prior to submitting the new QA Program to the Vice President, Nuclear Energy for signature. Mr. Caruso observed that this is primarily an implementation activity, not a further internal BG&E review. He recommended that the wording be changed from "... prior to further internal review" to "... prior to implementation."

We agree with the suggested wording change because it is consistent with our procedures, it does not in any way change the intent of the revision we proposed in Reference (a), and it is consistent with the specific wording of 10 CFR 50.54(a)(3).

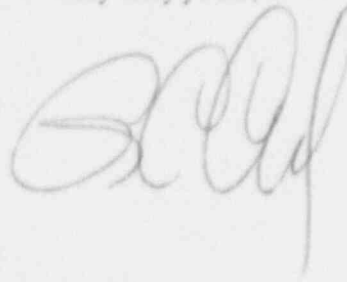
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We therefore request that this wording change be factored into your continuing review of Reference (a). Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

A handwritten signature in cursive script, appearing to be "D. A. Bruie", written in dark ink.

GCC/BSM/bsm/dlm

cc: D. A. Bruie, 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