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September 11, 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
Reply to a Notice of Violation, Inspection Report Nos. 50-317/92-19 and
50-318/92-19

REFERENCE: (a) NRC Inspection Reports 317/92-19 and 318/92-19

Gentlemen:

Reference (a) identified a violation of 10 CFR Part 50 Appendix B. Attachment (1) is our response to the violation.

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

Attachment

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Case No 1098603392
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ATTACHMENT (I)

REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT NOS. 50-317/92-19 AND 50-318/92-19

I. DESCRIPTION AND CAUSE OF VIOLATION.

Quality Verification (QV) hold points are inspection steps written into maintenance work procedures. For adequate QV hold-point inspection, verification must occur either while work is in progress or before work proceeds. Procedures require that QV be notified when a job is started and when the points are reached to ensure they are at the job site when needed.

Through a variety of mechanisms, Maintenance on several jobs failed to make the required notifications to QV. Some missed notifications resulted in Maintenance working through hold points without the required QV unit concurrence. These missed-notification issues were identified through, and addressed by, the Issue Report (IR) corrective action system. Beginning in 1990, the Independent Safety Evaluation Unit (ISEU) at Calvert Cliffs noted the incidence of these Issue Reports and tracked missed notifications as a specific trend. In 1991, ISEU presented the trend concerns at Management Review Board meetings on three occasions: May 3, June 14, and August 14.

As the line organization directly involved in the QV-notification trend, Maintenance was primarily responsible for its assessment and correction. In handling the individual Issue Reports, Maintenance initiated preventive actions for the observed deficiencies. These consisted primarily of training sessions to reinforce existing procedural requirements. In addition, the work control process was being significantly revised during 1991. Revised procedures and work planning changes were expected to correct the administrative ambiguities which contributed to the occurrence of failed notifications. Maintenance did not assess any of the reported occurrences as safety significant, nor did it assess their aggregate effect as significantly compromising the assurance that maintenance was effective in restoring equipment to full quality and compliance.

The Quality Assurance (QA) organization was also aware of the instances of missed notification and inspection and of Maintenance's actions, and they concurred in the overall assessment that equipment quality was being maintained. In addition, QA assessed that these omissions did not represent a significant degradation in their ability to effectively evaluate the quality of line organization work. QA believed that they could improve the procedures for QV activities to clarify requirements, and these concerns were included in the major rewrite of Quality Program procedures begun in early 1992.

In summary, our retrospective view of the missed QV notification trend is that these instances did not significantly degrade either our maintenance or quality program effectiveness. Identification of the trend at an early stage by ISEU was appropriate. Our initial corrective actions (enhanced training) were not effective in preventing recurrence. While we were actively pursuing additional corrective actions at the time that this issue was cited by your inspection activities, management should have taken further actions sooner.

II. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED.

QV and Maintenance management expectations regarding QV notification were provided to appropriate personnel. A strong Plant General Manager's statement was also issued.

Maintenance procedure MN-1-100, Conduct of Maintenance, was immediately revised to strengthen procedural controls over work resumption when QV "STOP WORK" orders are issued.

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INSPECTION REPORT NOS. 50-317/92-19 AND 50-318/92-19

The QV inspection-point stamping process was changed to eliminate one missed-notification cause.

Calvert Cliffs Instruction (CCI)-116, Program Deficiency Report (PDR) Program, was approved. This procedure classifies missed hold-point and notification issues as ones which require the initiation of a program PDR.

III. CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS.

Calvert Cliffs will continue the Quality Program procedural improvements already under review as part of our Procedure Upgrade Program effort. CCI-116 was a part of this, and other key elements of the revised procedural hierarchy for Quality Programs have been reviewed to incorporate concerns reflected in this violation. These elements, some QJ-3 series procedures, are scheduled for implementation by October 1, 1992.

Line management and Quality Assurance will ensure that all affected parties understand QV Program expectations. Nuclear Maintenance Section will accept responsibility for tracking the QV-notification trend. The trend will be evaluated monthly and further corrective actions will be taken to correct it, if necessary.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED.

Compliance was achieved when immediate corrective action was taken to address the adverse trend. Significant trend reduction was seen following issuance of the management expectations.