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February 14, 1985

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Washington, D.C. 20555

ATTN: Mr. J. R. Miller, Chief
Operating Reactors Branch #3

Subject: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 and 2, Docket Nos. 50-317 and 50-318
Integrated Living Schedule Concept

Gentlemen:

On May 9, 1983, Generic Letter 83-20, "Integrated Scheduling for Implementation of Plant Modifications," was issued. This letter endorsed the integrated living schedule concept and encouraged licensees to develop integrated living schedules. An acceptable example was provided by referencing the schedule developed by Iowa Electric Lighting and Power Company for the Duane Arnold Energy Center. Prior to the date of issue of Generic Letter 83-20, the integrated living schedule concept had been the subject of two informal meetings between the NRC staff and representatives of Baltimore Gas & Electric Co. At these meetings we indicated that the concept appeared to have merit as a management tool and that we would investigate the matter further. During the latter part of 1983, we held discussions with utilities and consulting firms having experience in this field so we could better understand the level of effort and licensing commitment involved in the development and maintenance of an integrated living schedule.

Following the preliminary investigations, a committee was established and tasked with (1) performing an assessment of our existing scheduling systems over a six month period, (2) determining the feasibility of developing an interdepartmental system to prioritize and schedule all activities supporting Calvert Cliffs (NRC and BG&E initiated), and (3) making recommendations on how best to implement such a system. A consulting firm was hired to assist in our assessment.

On the basis of our findings, we have initiated development of the Calvert Cliffs Integrated Management System (IMS), which will be similar (in some respects) to internal integrated scheduling systems in place at other nuclear facilities. To derive the maximum benefit as a management tool, the IMS effort has been scoped in a manner which we believe goes beyond the current efforts developed and being used within the industry. The purpose of IMS will be to provide interdepartmental planning, scheduling, and budgeting at the management level for all major modifications, activities, and services associated with supporting Calvert Cliffs. The IMS will provide a mechanism

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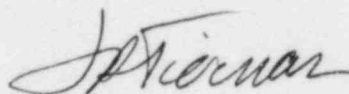
by which NRC-proposed modifications and activities will be prioritized and scheduled along with BG&E identified improvement projects. The prioritization system is being developed on the basis of optimizing the implementation of projects which contribute most to public safety, personnel safety, economic performance and productivity of the Calvert Cliffs facility without adversely impacting safety. Eventually we hope to "resource constrain" the IMS data base so schedules developed via the system appropriately reflect our actual manpower capabilities and budgetary limitations.

We plan to complete development of the IMS data base in early 1985. This will facilitate using the system on a trial basis. It is clear that a substantial period of time will be required to implement the final system because all departments supporting Calvert Cliffs will be participating. We have not defined a final implementation date at this point in the development process.

We believe the IMS has the potential to provide an improved basis from which to negotiate the schedules for implementing regulatory requirements, while lending appropriate consideration to plant betterment projects and maintenance activities. Our past performance in negotiating and meeting regulatory commitments has generally been satisfactory. We expect our future performance in this area will be enhanced with the IMS in place, and in view of the present NRC trend toward pre-integration of generic technical issues so as to provide for logical and efficient implementation of necessary regulatory changes, we do not believe that a "license contract" to facilitate the schedule change process will be necessary.

Should you have questions regarding this information, please contact us.

Very truly yours,



JAT/BSM/LOW/bsb

cc: D. A. Brune, Esq.
G. F. Trowbridge, Esq.
Mr. D. H. Jaffe, NRC
Mr. T. Foley, NRC