

## CHARLES CENTER · P. O. BOX 1475 · BALTIMORE, MARYLAND 21203

February 11, 1985

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

Director of Nuclear Reactor Regulation Attention: Mr. J. R. Miller, Chief Operating Reactors Branch #3 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject:

Calvert Cliffs Nuclear Power Plant

Units Nos. 1 & 2: Dockets Nos. 50-317 and 50-318

Response to NRC Generic Letter 84-24

Gentlemen:

The subject generic letter requested a certification that: (a) an environmental qualification (EQ) program is in place at our plants that will satisfy the requirements of 10 CFR Section 50.49 within the currently approved schedule without further extension; (b) the plants have at least one path to safe shutdown using fully qualified equipment or have submitted a justification for continued safe operation (JCO) pending full qualification of any equipment not fully qualified; and (c) all other equipment within the scope of 50.49 is either fully qualified or a JCO has been submitted pending full qualification. The purpose of this letter is to certify that Calvert Cliffs Units 1 and 2 meet the conditions specified above with exceptions as discussed below.

Our letter of January 24, 1985 (R. F. Ash to J. R. Miller) indicated that there could be some items which would require extensions and that we would take those items into account when providing the certifications requested by Generic Letter 84-24, as described above. We have now identified a number of items, some of which are ongoing EQ activities and some of which involve equipment which was only recently placed within the scope of the EQ Program, that will require extensions to the schedule established by 10 CFR 50.49. In addition, the solenoids for the nydrogen sampling system isolation valves inside containment lack qualification for a high moisture environment. While these (Valcor) valves were procured as fully qualifed replacements for the original valves, following installation it was determined that moisture seals were not included in the vendor's scope of supply and had to be added to the valves. The seal kits are on site, and we will install them during the uncoming refueling outages for each Unit. We are continuing to review the status of all remaining EQ reviews and are preparing the necessary requests for extensions and associated JCOs. We expect to submit our requests for extensions, including additional information on the solenoid valves, for your review and approval by February 22, 1985.

In general, the extensions will pertain to several categories of equipment, including valve position limit switches, motor-operated and solenoid valves, terminal blocks and pressure switches and will be keyed to our refueling outage schedule. All of

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the remaining qualification activities for Unit 1 are scheduled for completion during the upcoming refueling outage, which is now expected to commence on April 5, 1985. The outage had previously been scheduled to start prior to the rule deadline, on March 29, 1985. Thus, we will request that an extension be granted for the period of time between the March 31, 1985 rule deadline and the end of the Unit 1 outage.

The remaining Unit 2 work consists primarily of qualification activities for items of electrical equipment which have recently been added to the scope of 10 CFR 50.49 or for previously qualified equipment which has been shown to be deficient by recent testing experience (e.g., terminal blocks). Extensions will be requested until the Fall 1985 Unit 2 refueling outage if the required qualification activity is outage-related or if a significant procurement lead time is involved. Qualification work which can be performed non-outage will be completed as soon as possible prior to the Fall 1985 outage upon completion of engineering and receipt of any required parts and materials. We have reviewed all of the NRC Information Notices and Bulletins specified in Generic Letter 84-24 and have taken appropriate action where the information as presented indicated the possible existence of a qualification problem applicable to Calvert Cliffs. These actions will also be reflected in our upcoming submittal, as appropriate.

If you should have any questions, please do not hesitate to contact us.

Very truly yours,

AEL/BSM/vf

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