BALTIMORE GAS AND ELECTRIC COMPANY

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NUCLEAR POWER DEPARTMENT CALVERT CLIFFS NUCLEAR POWER PLANT LUSBY, MARYLAND 20657

January 18, 1985

U.S. Nuclear Regulatory Commission Office of N clear Reactor Regulation Washington, DC 20555

ATTENTION: Mr. James R. Miller, Chief

Operating Reactors Branch #3

Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant

Unit No. 2; Docket No. 50-318

Inservice Inspection Program for ASME Code Section XI Requirements

REFERENCES: (a) BG&E Letter dated 11/19/83, from Mr. A. E. Lundvall, Jr., to Mr. Robert W. Reid

- (b) BG&E Letter dated 8/30/82, from Mr. A. E. Lundvall, Jr., to Mr. Robert A. Clark
- (c) BG&E Letter dated 12/21/82, from Mr. A. E. Lundvall, Jr., to Mr. Robert A. Clark

Gentlemen:

References (a) and (b) transmitted a request for exemption from ASME Code Section XI hydrostatic pressure testing requirements for certain repairs and modifications made to portions of safety-related systems at Calvert Cliffs. Reference (a) addressed portions of the main steam and feedwater systems at Calvert Cliffs for pipe sizes 5 inches and smaller. Reference (b) addressed portions of pipe associated with the main steam supply to the Auxiliary Feedwater System upstream of 2-CV-4070 and 2-CV-4071. Justification for the above was based on precluding additional hydrostatic pressure cycles on the Steam Generator Vessels and is explained in detail in the above references.

Reference (c) transmitted a request for exemption from ASME Code Section XI hydrostatic pressure testing requirements for reasons similar in scope to References (a) and (b). This action was necessary due to an oversight in the implementation of the Non-Destructive Examination procedures in references (a) and (b). As such, we were requested to provide a written description of our corrective actions.

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To preclude similar occurrences in the future, our Inservice Inspection Engineer has established a file of all approved exemptions so that any future planning for modifications work can reference a central file of exemptions. Additionally, training was provided for engineers involved in the modification process which described the circumstances addressed by reference (c) and emphasized the importance of thoroughly researching code requirements, exemptions, and commitments prior to prescribing Non-Destructive Examination procedures. These corrective actions were fully implemented by February 15, 1984.

Very truly yours,

R. E. Denton
General Supervisor Training & Technical Services

RED/LOW/gla

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