

February 29, 1988

Docket Nos. 50-317
and 50-318

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Mr. J. A. Tiernan
Vice President-Nuclear Energy
Baltimore Gas and Electric Company
P. O. Box 1475
Baltimore, Maryland 21203

Dear Mr. Tiernan:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION AND SCHEDULAR COMMITMENTS FOR
COMPLETION OF DETAILED CONTROL ROOM DESIGN REVIEW IMPLEMENTATION
(TACS 56110 AND 56111)

The NRC Confirmatory Order dated June 14, 1984 required your submission of a Detailed Control Room Design Review (DCRDR) summary report, including a proposed implementation schedule, no later than January 1, 1985.

Your letter of December 31, 1984, which submitted your DCRDR summary report, prioritized and scheduled the completion of corrective actions for all identified human engineering discrepancies (HEDs), as follows:

- "Priority A [HEDs] - Prompt - By the end of the next refueling outage for each unit, subject to the availability of materials and engineering.
- Priority B [HEDs] - Near Term - By the end of the second refueling outage for each unit, subject to the availability of materials and engineering.
- Priority C [HEDs] - Long Term - By the end of the third outage for each unit."

This appeared to commit you to resolving Calvert Cliffs HEDs according to the schedule given below:

	Unit 1	Unit 2
Priority A	Spring 1985	Fall 1985
Priority B	Fall 1986	Spring 1987
Priority C	Spring 1988	Fall 1988

However, close examination of Attachment C, "Summary of Human Engineering Deficiencies," of your December 31, 1984 submittal indicates that you did not consider the Spring 1985 outage to be the next Unit 1 refueling outage, though your schedule submittal date was December 31, 1984, but rather, viewed Fall 1986 as Unit 1's next refueling outage. Thus, the schedule actually implied for Unit 1 (Unit 2's schedule remained the same) was:

	<u>Unit 1</u>
Priority A HEDs	Fall 1986
Priority B HEDs	Spring 1988
Priority C HEDs	Fall 1989

On November 1, 1985, you submitted a supplement to the December 31, 1984 DCRDR summary report. This supplement was in response to NRC staff concerns regarding the adequacy of your DCRDR program plan in identifying and correcting all HEDs. In this supplemental program plan, you committed to submitting a supplemental DCRDR summary report to the NRC in June 1987 and to prioritizing and correcting all additional HEDs identified according to the following schedule:

	<u>Unit 1</u>	<u>Unit 2</u>
Supplemental Priority A HEDs	Spring 1988	Fall 1988
Supplemental Priority B HEDs	Fall 1989	Spring 1990
Supplemental Priority C HEDs	Spring 1991	Fall 1991

Subsequently, your schedule for completion of original and supplemental HEDs has slipped significantly due to 1) manpower requirements in instrumentation-and-controls engineering and 2) the shift to a twenty four month operating cycle. In your letter of October 24, 1986, you notified the NRC that corrective action on 110 HEDs (30 of which were scheduled for completion by Fall 1986, 39 by Spring 1988 and 41 by Fall 1989) was being deferred and that these HEDs were being transferred into the supplemental DCRDR program. This deferment was attributed to the demands placed on instrumentation-and-controls engineering in completing other NUREG-0737 items. Then in April 1987, you commenced shifting to a twenty four month operating cycle from an eighteen month cycle. This shift automatically delayed the supplemental program HED correction dates as follows:

	<u>Unit 1</u>	<u>Unit 2</u>		
<u>Supplemental HEDs</u>	<u>18 mo.</u>	<u>24 mo.</u>	<u>18 mo.</u>	<u>24 mo.</u>
Priority A	Spring 1988	Spring 1988	Fall 1988	Spring 1989
Priority B	Fall 1989	Spring 1990	Spring 1990	Spring 1991
Priority C	Spring 1991	Spring 1992	Fall 1991	Spring 1993

Finally, in your May 29, 1987 submittal, you deferred submission of the supplemental DCRDR summary report by one year to June 1988. This resulted in further delays in the completion of Priority A, Unit 1 supplemental HEDs by two full years until Spring 1990.

Thus, through the transfer of the 110 original HEDs to the supplemental program, the shift to a twenty four month operating cycle and the delays in the completion schedule, numerous HEDs, that originally were to be corrected between Fall 1986 and Fall 1989, will not be corrected until as late as Spring 1993.

In response to these program changes and delays, the NRC staff and its consultant, Science Applications International Corporation (SAIC), met with BG&E at Calvert Cliffs on October 6, 1987. This meeting centered on the NRC staff's concerns about BG&E's schedule for the remaining DCRDR activities. The enclosed audit report was prepared by SAIC. The NRC staff agrees with the technical positions and conclusions presented in the enclosed audit report.

As a result of your DCRDR history and of this meeting, the NRC staff requests that BG&E include the following in your June 1988 supplemental DCRDR summary report:

1. Provide a commitment to correct all Human Engineering Discrepancies (HEDs) for Unit 2 prior to restart from the Spring 1991 refueling outage and reaffirm your October 24, 1986 commitment to correct all Unit 1 HEDs prior to restart from the Spring 1992 refueling outage.
2. Respond to the following inquiries concerning the oversight review committee that reviews all proposed HED resolutions:
 - a. What is the process for review by the committee and its methods for assessment and prioritization of HEDs?
 - b. What is the committee's schedule for responding to proposed HED resolutions?
 - c. When the committee is not in favor of proposed HED resolutions, how is this handled?
 - d. Who (or how) is final approval or disapproval of proposed HED resolutions provided?
3. During the onsite meeting, the staff reviewed a listing of all HEDs that had been classified in the safety-significant Categories 1 and 2. The staff also raised the concern that safety-significant HEDs are not being corrected in a timely manner. Please address this NRR staff concern.

When responding to this request, please include our technical assignment control numbers (TAC'S 56110 and 56111) in your subject line. Including these numbers permits tracking of all correspondence related to this specific issue in the NRC's computerized tracking system (NUDOCS) which also is available for public use at the NRC's Public Document Room.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore OMB clearance is not required under PL 96-511.

Sincerely,

Scott Alexander McNeil, Project Manager
Project Directorate I-1
Division of Reactor Projects, I/II

Enclosure:
As stated

cc: See next page

PDI-1 *ed*
CVogan
2/29/88

PDI-1
SMcNeil *Sam*
2/25/88

RL
PDI-1
RCapra
2/25/88

Mr. J. A. Tiernan
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant

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ATTACHMENT 1
AUDIT REPORT