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JOSEPH A. TIERNAN
VICE PRESIDENT
NUCLEAR ENERGY

February 23, 1988

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

ATTENTION: Mr. Frank J. Miraglia
Associate Director for Projects

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Generic Letter 88-02, Integrated Safety Assessment Program (ISAP) II

REFERENCE: (a) Letter from Mr. A. E. Lundvall, Jr. (BG&E) to Mr. H. L. Thompson, Jr. (NRC), dated July 8, 1985, Generic Letter 85-07, Implementation of Integrated Schedules for Plant Modifications

Gentlemen:

Baltimore Gas and Electric has reviewed Generic Letter 88-02 concerning utility participation in the ISAP II Program. At this time, we have no interest in participating in this proposed program.

It appears from the information provided in the generic letter that the ISAP II program consists of a plant specific, risk based, integrated schedule. We have implemented an Integrated Management System (IMS) which is a planning and scheduling system similar to the integrated schedule for plant modifications outlined in a proposed NRC policy statement. Our IMS provides a resource leveling, tracking, and reporting capability. The scheduling portion of the system uses a benefit-risk/cost methodology for prioritizing projects. We have also performed a modified Level I PRA as part of our participation in the voluntary IPE program. We will upgrade our Level I PRA when the requirements are finalized as part of the IPE generic letter.

Within our IMS program we have always provided for discussions with the NRC, however, we continue to feel that our scheduling methods should not be the subject of a license amendment. The response to Generic Letter 85-07 (Reference a) explains why we oppose the use of a license amendment for our plant modification scheduling. Because the ISAP program appears to require a license amendment for modifying accepted schedules, it runs counter to our previous, as well as current, opinion.

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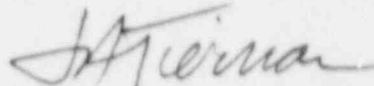
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In summary, we have chosen not to participate in the ISAP II program for two reasons; (1) we prefer to upgrade our Level I PRA as part of the separate IPE program and (2) the requirement for a scheduling license amendment is contrary to our current position.

Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



JAT/PSF/dlm

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
S. A. McNeil, NRC
W. T. Russell, NRC
D. C. Trimble, NRC
NRC Document Control Desk

Integrated Safety Assessment Program (ISAP) II

Response Format to Generic Letter 88-02

Facility Name: Calvert Cliffs 1 & 2

Utility: Baltimore Gas & Electric

Individual Contact Name: P. S. Furio Phone Number: (301) 260-4374

An expression of interest will not be considered a commitment to participate on the part of the utility.

1. Would you be interested in participating in ISAP II? If so, in what time frame?

We are not interested in participating in ISAP II.

2. Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial prior to making a decision?

See Item 5.

3. Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility or facilities?

See Item 5.

4. If you remain undecided regarding participation, what additional information do you need in order to make a decision?

N/A

5. Do you have any potential concerns about participating in ISAP II?

- We prefer to upgrade our Level 1 PRA as part of the separate IPE program.
- The requirement for a scheduling licensing amendment is contrary to our previously established position.

5. Do you have any suggestions for program improvements or changes?

None, at this time.