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VICE PRESIDENT
NUCLEAR ENERGY

June 3, 1988

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Request for Additional Information - Proposed Changes to Technical
Specification Organizational and Training Requirements

REFERENCE: (a) Letter from Mr. S. A. McNeil (NRC) to Mr. J. A. Tiernan (BG&E),
dated May 19, 1988, same subject

Gentlemen:

This is in reply to Reference (a). The additional information you requested is provided in Enclosure (1).

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

Very truly yours,

JAT/JRL/DLS/dlm

Enclosure

cc: D. A. Brune, Esquire
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ENCLOSURE (1)

RESPONSE to REQUEST for ADDITIONAL INFORMATION - PROPOSED CHANGES to TECHNICAL SPECIFICATION ORGANIZATIONAL and TRAINING REQUIREMENTS

NRC Concern 1.a.

Please provide a detailed description of how you currently meet the requirements of ANSI N18.1 including a correlation of individual BG&E staff positions and responsibility to those described in ANSI N18.1 for the Plant Manager, Operations Manager and Operations Supervisor.

BG&E Response

The organizational structure currently in the Technical Specifications aligns with ANSI N18.1 as follows:

Plant Manager - Manager, Nuclear Operations Department (MNO). While maintenance and some technical support functions are not under his direct supervisory control, he does have the overall responsibility for ensuring the plant is operated and maintained safely, reliably, and efficiently. This is clearly stated in Section 12.1.1 of the FSAR. For those activities not under his direct supervisory control, he has control through budgeting, scheduling, procedure approval, etc. The present MNO held an SRO license at Calvert Cliffs for six years.

Operations Manager - General Supervisor, Operations (GSO). With the current structure, the GSO directly supervises the Operations Shift Supervisors and is responsible for the day-to-day operation of the plant. The present GSO holds a current SRO license.

Operations Supervisors - Shift Supervisors (SS). The SS is responsible to the GSO for the operation of the plant during his shift. Each SS holds a current SRO license.

NRC Concern 1.b.

Please provide a detailed description of how you will meet the requirements of ANSI N18.1, including a correlation of BG&E staff positions and responsibilities to those described in ANSI N18.1 for the Plant Manager, Operations Manager and Operations Supervisors, if the active SRO license requirement of the GSO is deleted as proposed in your March 1988 submittal.

BG&E Response

Under the proposed changes as proposed in our March 15, 1988 submittal, the MNO continues to be the Plant Manager and the SSs continue to be the Operations Supervisors as described in the current structure. A new position, Assistant General Supervisor of Operations (AGSO), is established between the GSO and the SSs. With this structure, the AGSO assumes responsibility for the direct supervision of the SSs and the responsibility for the day-to-day operation of the plant. He, therefore, becomes the "Operations Manager"

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described in ANSI N18.1. The GSO becomes much less involved in directing the operation of the plant and more involved in budgeting for and coordinating the maintenance and engineering resources used to maintain and modify the plant. In the context of ANSI N18.1, the GSO is basically an Assistant Plant Manager. To ensure that the GSO does have an excellent understanding of plant operations, we have specified that he must have held an SRO license at Calvert Cliffs.

NRC Concern 1.c.

Please provide an application in accordance with the requirements of 10 CFR 50.54(a)(3), if you determine that you are reducing the current commitments in the QA program, otherwise, a clear and unequivocal statement that this change does not in any way reduce any current commitments provided in the QA program.

BG&E Response

This change does not in any way reduce any current commitments provided in the QA program. The individual who supervises the SROs and has responsibility for the day-to-day operation of the plant holds an SRO license under both the current and proposed structure. In fact, this proposal strengthens the organization because it requires that the supervisor of the "Operations Manager" must have held an SRO license.

NRC Concern 2

Currently, Technical Specification 6.5.1, "Plant Operations and Safety Review Committee (POSRC)," requires that the GSO be a voting member of the POSRC. And as previously described, Technical Specification 6.2.2, "Facility Staff," requires that the GSO, as provided in Figure 6.2-2, shall have an active SRO license. As your submittal of March 15, 1988, proposes to delete the active SRO license requirement for the GSO, please justify, through a safety evaluation and a determination of significant hazards, the effect of deleting the only active SRO license from the POSRC.

BG&E Response

The deletion of the only active SRO license from the POSRC by relaxing the requirement for the GSO to hold such a license has been evaluated against the standards in 10 CFR 50.92 and has been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed amendment would not:

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- (i) involve a significant increase in the probability or consequences of an accident previously evaluated;

No modification to plant equipment is made by this proposed change. This change is administrative in nature and, therefore, does not affect those accidents evaluated in the Updated FSAR.

or

- (ii) create the possibility of a new or different type of accident from any accident previously evaluated;

No new or different kind of accidents from those previously evaluated in the Updated FSAR are created by this change.

or

- (iii) involve a significant reduction in a margin of safety.

Not having a person holding a current SRO license on POSRC will not reduce the effectiveness of POSRC. As a minimum, there will always be at least one member who has held an SRO license. With the present membership, there are four people who have held an SRO license. It is important to have members who have a good fundamental understanding of the operation of the plant, but it is not important that any have the detailed knowledge level which must be maintained to keep an SRO license current. All procedures which directly affect the operation of the plant receive a detailed review by a person holding a current SRO license. If questions are raised during POSRC review which require detailed operational knowledge, then an SRO license holder can be called into the meeting.