



CHARLES CENTER • P.O. BOX 1475 • BALTIMORE, MARYLAND 21203

CHARLES H. CRUSE
MANAGER
NUCLEAR ENGINEERING SERVICES DEPARTMENT

October 4, 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 Relief from ASME Code Section XI Requirements

REFERENCES: (a) Letter from Mr. C. H. Cruse (BG&E) to NRC Document Control Desk,
dated September 15, 1988, same subject
(b) Letter from Mr. C. H. Cruse (BG&E) to NRC Document Control Desk,
dated September 29, 1988, same subject

Gentlemen:

Reference (a) was submitted pursuant to 10 CFR 50.55a(g)(6)(i), requesting schedule relief from an ASME Code Section XI requirement. Reference (b) revised Reference (a), requesting relief in accordance with 10 CFR 50.55a(a)(3), proposing an alternative to an ASME Code Section XI reporting schedule.

This letter clarifies and further justifies Reference (b). We are requesting a 30-day extension for submitting Form NIS-2. Attempting to comply with the present October 2, 1988 deadline would result in unusual difficulties without a compensating increase in the level of quality and safety.

Unusual difficulties would result if we were required to meet the deadline. We do not have sufficient manpower with the appropriate level of training and expertise to perform the required reviews prior to October 2, 1988. Only certain personnel in our organization are qualified to perform these reviews, and there is not adequate time to research and procure contract support. This is our first experience with completing Form NIS-2. When we planned for its completion, we did not anticipate the problems we have encountered, as discussed below.

During 1988, BG&E management has placed special emphasis on resolving plant maintenance concerns. As a result, over 13,000 Maintenance Orders (MOs) have been issued thus far in 1988 for Calvert Cliffs. Approximately 12,000 MOs have been worked this year. There are currently over 1,800 MO packages which have been worked and partially reviewed, but have not completed all subsequent processing before being logged into

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Plant History. About 80 Calvert Cliffs Unit 1 packages were completed this year which have ASME Code Section XI Class 1 or 2 Repair or Replacement Plans associated with them. In order to complete the data on the NIS-2 Forms, these packages must be searched for from among the post-work processing backlog. There is no unique way to track them separately from other maintenance orders in the system; consequently, locating them is not an efficient process. Once they are received, the Form NIS-2 can be completed, reviewed and certified for compliance.

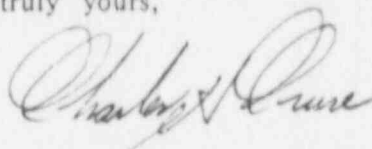
A compensating increase in the level of quality and safety would not result because the reviews required to complete the Form NIS-2 are not part of the verification process used to ensure equipment or component operability upon return-to-service. The reviews required to complete the Form NIS-2 conclude the post-testing administrative phase. The entire review process is described below.

Upon completion of any repair or replacement, an MO package is submitted to plant operations personnel for their review. The Control Room Supervisor (CRS) determines the testing required to verify system operability, using established guidance. This post-maintenance testing is specified on the Operations Test Document, which is attached to the MO. The CRS ensures the testing is performed in accordance with the Operations Test Document. Once completed, the Operations Test Document is reviewed by the CRS to verify adequacy. Operability is then determined based on test results and compliance with the Technical Specifications. The Operations Test Document is then forwarded to Plant History and the rest of the MO enters a complex administrative review phase, which includes a series of reviews involving other supervisors and organizations. The Form NIS-2 is the culmination of this phase.

In summary, although the completion of Form NIS-2 serves as another check, the contribution to quality and safety would not compensate for the unusual difficulty that would result without this 30-day extension.

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

Very truly yours,



CHC/DLS/dlm

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
S. A. McNeil, NRC
W. T. Russell, NRC
D. C. Trimble/V. L. Pritchett, NRC
T. Mcgette, DNR