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JOSEPH A. TIERNAN
VICE PRESIDENT
NUCLEAR ENERGY

December 1, 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
Proposed Change to the Final Safety Analysis Report Quality Assurance
Program Description and the BG&E Quality Assurance Policy

REFERENCES: (a) Letter to NRC Document Control Desk from Mr. J. A. Tiernan (BG&E), dated March 15, 1988, Request for Amendment
(b) Letter to Mr. J. A. Tiernan (BG&E) from Mr. S. A. McNeil (NRC), dated May 19, 1988, Request for Additional Information
(c) Letter to NRC Document Control Desk from Mr. J. A. Tiernan (BG&E), dated June 3, 1988, Response to Request for Additional Information

Gentlemen:

Reference (a) is a request for an amendment to our Technical Specifications. Reference (b) requested additional information regarding the amendment request. We provided the additional information in Reference (c).

A recent conversation with our NRR Project Manager concerning our response in Reference (c) has caused us to reconsider our position.

After further evaluation, we have determined that **CHANGE NO. 1** detailed in Reference (a) would result in a reduction in one of the commitments of our Quality Assurance Program. Pursuant to 10 CFR 50.54(a)(3), this letter submits, for your approval, a proposed change to our Final Safety Analysis Report quality assurance program description and our Quality Assurance Policy. These two documents contain identical information. Enclosure (1) identifies the change, the reason for the change, and the basis for concluding that the revised program incorporating the change continues to satisfy the criteria of 10 CFR 50 Appendix B and the Final Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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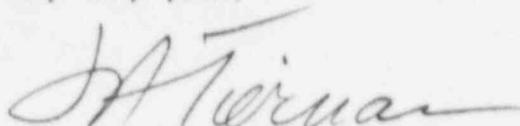
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Pursuant to 10 CFR 50.54(a)(3)(ii), all pages affected by this change are attached. Our Final Safety Analysis Report (FSAR) pages have not been changed to reflect a recent reorganization. The Quality Assurance Policy pages show how the FSAR pages will change with the annual FSAR update.

Item 1.c in Reference (b) dealt with a possible reduction in the current commitments in our Quality Assurance Program. This change revises our response in Reference (c) to Item 1.c. We believe this change will facilitate final review and approval, anticipated to occur early in January 1989, of the Technical Specification changes proposed in Reference (a).

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. A. Teruan".

JAT/DLS/dlm

Enclosure
Attachments

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. Magette, DNR

ENCLOSURE (1)

PROPOSED CHANGE TO THE FINAL SAFETY ANALYSIS REPORT QUALITY ASSURANCE PROGRAM DESCRIPTION

Pursuant to 10 CFR 50.54(a)(3)(ii), the following details regarding the subject proposed change are provided:

1. THE CHANGE

Presently, Section 1B, "Quality Assurance Program," of our Final Safety Analysis Report states that our QA program meets the requirements without exception of Regulatory Guide 1.8, "Personnel Selection and Training." Regulatory Guide 1.8 generally endorses the guidance provided in ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

We now wish to take exception to guidance offered in ANSI N18.1-1971 (the Standard) and state alternatives. Specifically, we wish to change the requirement that the role of the Operations Manager position as defined in Section 3.2.1 of the Standard and the attendant qualifications defined in Section 4.2.2 be satisfied by the same person. With the proposed change, the General Supervisor - Nuclear Operations (GS-NO) will continue to satisfy the role of Operations Manager as defined in Section 3.2.1 of the Standard in that he will be,

". . . a principal member of the operating organization reporting directly to the Plant Manager and having overall responsibility of the plant. . . ."

However, the proposed change would relegate the specific qualification requirement of Section 4.2.2 that the Operations Manager hold a Senior Reactor Operator's (SRO) license at the time of appointment to the active position to the position of the Assistant General Supervisor - Nuclear Operations (AGS-NO). Instead, the GS-NO would be required to either hold or have held an SRO license.

Since the proposed change would reduce by one level of management the position at which an SRO license must be held, it constitutes a slight reduction in a Quality Assurance Program commitment, and prior NRC review and approval is therefore necessary. The position of AGS-NO has existed now for approximately one year. The AGS-NO reports directly to the GS-NO and provides supervision of the Operations Unit, which operates the plant. The AGS-NO is required to hold and maintain an SRO license.

2. REASON FOR THE CHANGE

The principal reason for this change is to allow greater management flexibility in the selection of qualified personnel to fill the position of General Supervisor - Nuclear Operations. Greater emphasis will be placed on performing the overall managerial role as discussed in Section 3.2.1 of the Standard for principal members of the operating organization. This includes overall (or general) supervision of the Operations Unit, the Procedures Development & Modifications Acceptance Unit, and the Outage Maintenance Coordination Unit.

ENCLOSURE (1)

PROPOSED CHANGE TO THE FINAL SAFETY ANALYSIS REPORT QUALITY ASSURANCE PROGRAM DESCRIPTION

Concurrent with the greater emphasis on general supervisory responsibilities, slightly less emphasis will be placed on the direct and detailed supervision by the GS-NO of day-to-day shift operations.

There exists a second reason for this change which directly supports the principal reason discussed above. By relegating the requirement to hold an SRO license to the AGS-NO position, time formerly spent re-qualifying is now available to the GS-NO. Therefore, the time to function in the general supervisory role discussed in Section 3.2.1 of the Standard is significantly increased. This is viewed by Baltimore Gas & Electric as being highly beneficial and consistent with the intent of our Quality Assurance Program commitments. Meanwhile, an active SRO license requirement would be maintained at the position where it is most applicable and appropriate.

3. BASIS FOR CONCLUDING THAT THE REVISED PROGRAM IS SATISFACTORY

The reduction in Quality Assurance Program commitments is that the GS-NO would not be required to hold an SRO license at the time of appointment to the active position, as specified in Paragraph 4.2.2 of the Standard. However, the revised program would continue to satisfy the criteria of 10 CFR 50 Appendix B and the Final Safety Analysis Report quality assurance program description commitments previously accepted by the NRC, for the following reasons:

- The GS-NO will be required to hold or have held an SRC license at Calvert Cliffs. This ensures that he has an excellent understanding of plant operations and license requirements. ANSI 18.1-1971 only requires an SRO license at the time of appointment to the active position. It does not require the license to be maintained, nor is this necessary in order for the GS-NO to satisfactorily perform his job. On the other hand, the AGS-NO must not only have an SRO license at the time of appointment to the position, but he must maintain this license current;
- The GS-NO presently spends 21 full days a year in classroom, simulator requalification, and preparation for NRC testing to maintain an SRO license. This change would allow the GS-NO more time to effectively supervise the Operations Section. This change, therefore, will enhance overall quality and safety. This level of supervision does not require the current, in-depth, plant-specific knowledge which results from maintaining an SRO license; and

ENCLOSURE (1)

PROPOSED CHANGE TO THE FINAL SAFETY ANALYSIS REPORT
QUALITY ASSURANCE PROGRAM DESCRIPTOR

- Selection of highly qualified individuals for the GS-NO position would be enhanced by this change since more candidates could be considered for the job. The status of a candidate's SRO license is presently a major consideration during this selection process, since those candidates whose licenses are not current would require many months of requalification training.

In summary, while the proposed change constitutes a slight reduction in the Quality Assurance Program commitment, the revised program would continue to satisfy the requirements of 10 CFR 50 Appendix B and would result in other benefits which compensate for this reduction and maintain our overall level of quality and safety.

exception taken
in Table 1B-1.

1. The General Supervisor, Operations (GSO), is responsible to the Manager, NOD, for the operation of the plant, including the general supervision of all shift operating personnel and coordination of maintenance activities to support operations. This responsibility covers the safety of applicable plant personnel and equipment, all fuel-handling and refueling activities, and adherence to applicable license and regulatory requirements. The GSO fulfills the position and requirements of the Manager, ~~NOD~~, as defined in ANSI N18.1 (1971) *x with the* ^{Operations}

The GSO delegates primary management responsibility to the Shift Supervisor (SS) on duty to ensure the safe operation of the plant under all conditions. The SS maintains the broadest possible perspective on operational conditions that affect the safety of the plant. As the senior member of plant management on each shift, he exercises the command authority of his position to take whatever steps he deems necessary during emergency situations to place and maintain in a safe configuration either unit that may be affected.
2. The General Supervisor, Chemistry (GSC), is responsible to the Manager, NOD, for the chemistry and radiochemistry of the primary and secondary systems, and for maintaining radioactive effluents within accepted limits.
3. The General Supervisor, Radiation Safety (GSRS), is responsible to the Manager, NOD, for ensuring the radiation protection of personnel at CCNPP and compliance with radioactive material transport regulations.
4. The General Supervisor, Quality Control and Support (GSQCS), is responsible to the Manager, NOD, for emergency planning, fire protection, industrial safety, and quality control surveillance of NOD activities.

Additional details of the responsibilities of personnel who report to the Manager, NOD, are contained in implementing QAPs, Nuclear Plant Procedures, and TSs for CCNPP.

Manager, Nuclear Engineering Services Department

The Manager, NESD, is responsible for directing the efforts of personnel involved in design, modification, engineering, and licensing activities covered by the QA Program for CCNPP. These activities include nuclear, civil, mechanical, and electrical engineering; maintenance and modification engineering; fuel management; safety analysis; and project management.

Manager, Nuclear Maintenance Department

The Manager, NMD, is responsible for directing the mechanical, electrical, and controls maintenance and modifications, and electrical and mechanical quality control functions for CCNPP.

The organization of NMD is shown in Chapter 12 of the FSAR. The Manager, NMD, delegates responsibilities for accomplishing required activities as follows.

1. The General Supervisor, Mechanical Maintenance (GSMM), is responsible for directing the mechanical maintenance, and modifications to CCNPP in accordance with Company and regulatory requirements.

REGULATORY GUIDES

1.8 - Personnel Selection and Training (September 1975)**
This endorses ANSI N18.1 (03/08/71)***

1.16 - Reporting of Operating Information (as specified in Calvert Cliffs Technical Specifications)

1.30 - QA Requirements for Installation, Inspection, and Testing of Instrumentation and Electric Equipment (08/11/72)*
This endorses ANSI N45.2.4 (03/01/72)

1.33 - QA Program Requirements (Operation, Rev. 2, 02/78)**
This endorses N18.7-1976/ANS 3.2 (02/19/76)***

1.37 - QA Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants (03/16/73)**
This endorses ANSI N45.2.1 (02/26/73)***

1.38 - QA Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants (Rev. 2, 05/77)**
This endorses ANSI N45.2.2 (12/20/72)***

1.39 - Housekeeping Requirements for Water-Cooled Nuclear Power Plants (03/16/73)*
This endorses ANSI N45.2.3 (03/15/73)***

1.54 - QA Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants (06/73)**
This endorses ANSI N101.4 (11/28/72)***

1.58 - Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel (09/80)**
This endorses ANSI N45.2.6 (1978)***

1.64 - QA Requirements for the Design of Nuclear Power Plants (10/73)*
This endorses ANSI N45.2.11, Draft 3, Rev. 1 (07/73)

INDUSTRY STANDARDS

- * NRC endorses an industry Standard or draft without reservation
- ** NRC takes exception to or provides additional guidance in a regulatory position statement
- *** BG&E takes exception to guidance offered and states alternatives

TABLE IB-1

BALTIMORE GAS AND ELECTRIC COMPANY'S POSITION
ON GUIDANCE CONTAINED IN ANSI STANDARDSRevision of Industry Standards Applicable to the
Baltimore Gas and Electric Quality Assurance ProgramRequirement

Some of the Industry Standards listed in Section 1B.2 identify other Standards that are required, and some Regulatory Guides define the revisions of those Standards that are acceptable to the NRC.

Response

BG&E's QA Program was developed to respond to the specific revision of the documents listed in Section 1B.2 and is not necessarily responsive to other documents listed in the referenced Industry Standards.



ANS 3.2 - 1976

Item 1Requirement

Section 2.0 defines "Onsite Operation Organization" and "Operating Activities." Both definitions imply that the same organization performs both operations activities and maintenance activities.

Response

BG&E's NMD performs mechanical maintenance and modification and maintenance on electrical equipment and on instrument and control equipment.

Item 2Requirement

Section 5.2.15 requires that plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure every two years to determine if changes are necessary or desirable.

Response

BG&E applies this requirement of a two-year review to all plant procedures except test procedures performed less often than every two years or at unspecified frequencies. These are reviewed no more than 60 days before performance.

INSERT "A"

ANSI-N18.1 (03/08/71)

ITEM 1

REQUIREMENT

Paragraph 4.2.2 states that at the time of initial core loading or appointment to the active position, the Operations Manager shall hold a Senior Reactor Operator's (SRO) License.

Paragraph 3.2.1 states that positions at the functional level of Manager are those to which are assigned broad responsibilities for direction of major aspects of a nuclear power plant. This functional level generally includes the plant manager (plant superintendent, or other title), his line assistants, if any, and the principal members of the operating organization reporting directly to the plant manager and having overall responsibility for operation of the plant or for its maintenance or technical service activities.

RESPONSE

Baltimore Gas & Electric has two positions in its organization, General Supervisor-Nuclear Operations and Assistant General Supervisor-Nuclear Operations. Neither of these positions needs to individually meet all of the requirements of both paragraphs 3.2.1 and 4.2.2. The GS-NO will satisfy paragraph 3.2.1 and most of 4.2.2 except that he will not maintain an SRO license. Instead, the GS-NO will hold or have held an SRO license. The AGS-NO will hold and maintain an SRO license. The AGS-NO satisfies paragraph 4.2.2, but he does not satisfy 3.2.1 because he does not report directly to the plant manager.

REASON

The GS-NO will hold or have held an SRO license, as opposed to having a license at the time of appointment to the position. He will have an excellent understanding of plant operations. The AGS-NO will not only hold an SRO license at the time of appointment to the position, but he will maintain the license. The AGS-NO directly supervises the operating shift organization, whereas the GS-NO is also responsible for operations procedure development, modifications acceptance, and operations/maintenance coordination. The GS-NO's level of supervision does not require the current in-depth and plant specific knowledge which results from maintaining an SRO license.

Manager, Calvert Cliffs Nuclear Power Plant Department

The Manager, CCNPPD, is responsible for operation, chemistry, and maintenance activities at CCNPP. He must ensure that these activities are conducted in accordance with the plant operating license and TSs, the FSAR, and the Quality Assurance Manual for Nuclear Power Plants and its implementing procedures. The Manager, CCNPPD fulfills the position and requirements of the Plant Manager, as defined in ANSI N18.1 (1971).

The organization of CCNPPD is shown in Chapter 12 of the FSAR. The Manager, CCNPPD, delegates responsibilities for accomplishing required activities as follows:

1. The General Supervisor, Nuclear Operations (GSNO), is responsible to the Manager, CCNPPD, for the operation of the plant, including the general supervision of all shift operating personnel and coordination of maintenance activities to support operations. This responsibility covers the safety of applicable plant personnel and equipment, all fuel-handling and refueling activities, and adherence to applicable license and regulatory requirements. The GSNO fulfills the position and requirements of the ~~Manager, CCNPPD~~, as defined in ANSI N18.1 (1971), with the ^{Operations} ~~exception~~ taken in Table 1B-1. The GSNO delegates primary management responsibility to the Shift Supervisor (SS) on duty to ensure the safe operation of the plant under all conditions. The SS maintains the broadest possible perspective on operational conditions that affect the safety of the plant. As the senior member of plant management on each shift, he exercises the command authority of his position to take whatever steps he deems necessary during emergency situations to place and maintain in a safe configuration any unit that may be affected.
2. The General Supervisor, Chemistry (GSC), is responsible to the Manager, CCNPPD, for the chemistry and radiochemistry of the primary and secondary systems, and for maintaining radioactive effluents within specified limits.
3. The General Supervisor, Electrical and Controls, is responsible to the Manager, CCNPPD, for the conduct of electrical and instrument maintenance, repair, and modifications needed to keep the plant and its facilities, systems, and equipment in safe and efficient working condition. He is responsible for planning and supervising or controlling the electrical and instrument maintenance activities conducted by plant maintenance personnel, and for ensuring that work is performed in accordance with applicable Codes and Standards and that required maintenance records are developed and kept. He is responsible for controlling tools and equipment used for electrical and instrument maintenance, repair and modifications activities.
4. The General Supervisor, Mechanical Maintenance, is responsible to the Manager, CCNPPD, for the conduct of mechanical maintenance, repair, and modifications needed to keep the plant and its facilities, systems, and equipment in safe and efficient working condition. He is responsible for planning and supervising or controlling the mechanical maintenance activities conducted by plant maintenance personnel, and for ensuring that work is performed in accordance with applicable Codes and Standards and that

The QA Program was developed to meet the requirements of the industry Standards, and the Regulations and Regulatory Guides of the Nuclear Regulatory Commission (NRC) listed below. Exceptions taken to guidance contained in these documents and equivalent BG&E alternatives are stated in Table IB-1.

REGULATIONS

10 CFR 50.55a - Codes and Standards

10 CFR 50.59 - Changes, Tests, and Experiments

10 CFR 50, Appendix B - Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants

10 CFR 55 - Operators' Licenses

REGULATORY GUIDES

1.8 - Personnel Selection and Training (September 1975)**
This endorses ANSI N18.1 (03/08/71)***

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Baltimore Gas and Electric Quality Assurance Program

Requirement

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Response

BG&E's QA Program was developed to respond to the specific revision of the documents listed in Section IB.2 and is not necessarily responsive to other documents listed in the referenced Industry Standards.

see
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"B"
attached



ANS 3.2 - 1976

Item 1

Requirement

Section 5.2.15 requires that plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure every two years to determine if changes are necessary or desirable.

Response

BG&E applies this requirement of a two-year review to all plant procedures except test procedures performed less often than every two years or at unspecified frequencies. These are reviewed no more than 60 days before performance.

Reason

Engineering Test Procedures (ETPs) and others like them are written for a one-time-only performance and kept for reference for future similar tests. If they are used again, they are reviewed and modified to meet conditions existing at the time of performance.

Some Surveillance Test Procedures (STPs) are performed every three to five years. They too are reviewed before each performance to ensure that they are compatible with existing conditions and responsive to current needs.

INSERT "B"

ANSI-N 18.1 (03/08/71)

ITEM 1

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Paragraph 4.2.2 states that at the time of initial core loading or appointment to the active position, the Operations Manager shall hold a Senior Reactor Operator's (SRO) License.

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