

JUL 11 1986

Docket Nos. 50-317; 50-318

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

Gentlemen:

Subject: Assessment of the Quality of Licensee Event Reports (LERs) - Calvert
Cliffs Nuclear Power Plant, Units 1 and 2

As part of the SALP process, the NRC Office for Analysis and Evaluation of Operational Data (AEOD) evaluated LERs submitted during the recent SALP assessment period for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2. The assessments (portions enclosed) were performed using a methodology similar to that described in NUREG/CR-4178, "An Evaluation of Selected Licensee Event Reports Prepared Pursuant to 10 CFR 50.73."

The NRC considers it important to achieve uniform, high quality LERs from all operating power reactors to enable licensees and AEOD to effectively identify "precursor events" and emerging trends or patterns of potential safety significance. Generic studies triggered by events reported at specific units can lead to improvements in the level of reactor safety only if the available data-base is uniform and of high quality.

Based on a limited sample, AEOD concludes that the Calvert Cliffs LERs sampled were of better than average quality as compared to other licensees that have been evaluated using this methodology. I invite you to review the enclosed analyses and to discuss the evaluation and any planned improvements to your event reporting system at the forthcoming NRC SALP management meeting.

Sincerely,

Original Signed By:

William F. Kane, Deputy Director
Division of Reactor Projects

Enclosure: As Stated

cc w/encl:

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SUMMARY

An evaluation of the content and quality of a representative sample of the Licensee Event Reports (LERs) submitted by Calvert Cliffs 1 and 2 during the October 1, 1984 to April 30, 1986 Systematic Assessment of Licensee Performance (SALP) period was performed using a refinement of the basic methodology presented in NUREG/CR-4178.¹ The results of this evaluation indicate that Calvert Cliffs 1 and 2 have an overall average LER score of 8.2 out of a possible 10 points, thus ranking them 15th and 16th out of the 62 units (i.e., licensees) that have been evaluated to date using this methodology.

The principle weaknesses, in terms of safety significance, involve the requirements to assess the safety consequences and implications of the event and to adequately identify failed components in the text. Deficiencies in the safety consequence discussion prompts concern as to whether or not events are being evaluated such that the possible consequences of the event, had it occurred under a different set of initial conditions, are identified. The failure to adequately identify all components that fail prompts concern that others in the industry won't immediately have access to information concerning possible generic problems.

A strong point for the Calvert Cliffs LERs is that the root cause and corrective actions discussions were generally well written.

ATTACHMENT A

AEOD INPUT TO SALP REVIEW FOR CALVERT CLIFFS 1 AND 2

Introduction

In order to evaluate the overall quality of the contents of the Licensee Event Reports (LERs) submitted by Calvert Cliffs 1 and 2 during the October 1, 1984 to April 30, 1986 Systematic Assessment of Licensee Performance (SALP) assessment period, a representative sample of each unit's LERs was evaluated using a refinement of the basic methodology presented in NUREG/CR-4178.¹ The sample consists of a total of 16 LERs for the station (i.e., 8 LERs for Calvert Cliffs 1 and 8 for Calvert Cliffs 2), which represents half of the LERs that were on file at the time the evaluation was started. Calvert Cliffs' LERs were evaluated as one sample because it was determined that their LERs are both written and formally reviewed at the station, rather than unit, level. See Appendix A for a list of the LER numbers in the sample.

It was necessary to start the evaluation before the end of the SALP assessment period because the input was due such a short time after the end of the SALP period. Therefore, not all of the LERs prepared during the SALP assessment period were available for review.

Methodology

The evaluation consists of a detailed review of each selected LER to determine how well the content of its text, abstract, and coded fields meet the requirements of NUREG-1022², and Supplements 1³ and 2⁴ to NUREG-1022.

The evaluation process for each LER is divided into two parts. The first part of the evaluation consists of documenting comments specific to the content and presentation of each LER. The second part consists of determining a score (0-10 points) for the text, abstract, and coded fields of each LER.

The LER specific comments serve two purposes: (1) they point out what the analysts considered to be the specific deficiencies or observations concerning the information pertaining to the event, and (2) they provide a basis for a count of general deficiencies for the overall sample of LERs that was reviewed. Likewise, the scores serve two purposes: (1) they serve to illustrate in numerical terms how the analysts perceived the content of the information that was presented, and (2) they provide a basis for the determination of an overall score for each LER. The overall score for each LER is the result of combining the scores for the text, abstract, and coded fields (i.e, $0.6 \times \text{text score} + 0.3 \times \text{abstract score} + 0.1 \times \text{coded fields score} = \text{overall LER score}$).

The results of the LER quality evaluation are divided into two categories: (1) detailed information and (2) summary information. The detailed information, presented in Appendices A through D, consists of LER sample information (Appendix A), a table of the scores for each sample LER (Appendix B), tables of the number of deficiencies and observations for the text, abstract and coded fields (Appendix C), and comment sheets containing narrative statements concerning the contents of each LER (Appendix D). When referring to Appendix D, the reader is cautioned not to try to directly correlate the number of comments on a comment sheet with the LER scores, as the analyst has flexibility to consider the magnitude of a deficiency when assigning scores.

Discussion of Results

A discussion of the analysts' conclusions concerning LER quality is presented below. These conclusions are based solely on the results of the evaluation of the contents of the LERs selected for review and as such represent the analysts' assessment of the station's performance (on a scale of 0 to 10) in submitting LERs that meet the requirements of 10 CFR 50.73(b). Calvert Cliffs 1 and 2 were evaluated as a station, rather than two separate units, because it was determined that the Calvert Cliffs LERs are both written and formally reviewed at the station, rather than the unit, level.

Table 1 presents the average scores for the sample of LERs evaluated for Calvert Cliffs 1 and 2. The reader is cautioned that the scores resulting from the methodology used for this evaluation are not directly comparable to the scores contained in NUREG/CR-4178 due to refinements in the methodology. In order to place the scores provided in Table 1 in perspective, the distribution of the overall score for all licensees that have been evaluated using the current methodology are provided in Figure 1. Additional scores are added to Figure 1 each month as other licensees are evaluated. Table 2 and Appendix Table B-1 provide a summary of the information that is the basis for the average scores in Table 1. For example, Calvert Cliff's average score for the text of the LERs that were evaluated is 8.3 out of a possible 10 points. From Table 2 it can be seen that the text score actually results from the review and evaluation of 17 different requirements ranging from the discussion of plant operating conditions before the event [10 CFR 50.73(b)(2)(ii)(A)] to text presentation. The percentage scores in the text summary section of Table 2 provide an indication of how well each text requirement was addressed by the station for the 16 LERs that were evaluated.

Discussion of Specific Deficiencies

A review of the percentage scores presented in Table 2 will quickly point out where Calvert Cliffs station is experiencing the most difficulty in preparing LERs. For example, requirement percentage scores of less than 75 indicate that the station probably needs additional guidance concerning these requirements. Scores of 75 or above, but less than 100, indicate that the station probably understands the basic requirement but has either: (1) excluded certain less significant information from most of the discussions concerning that requirement or (2) totally failed to address the requirement in one or two of the selected LERs. The station should review the LER specific comments presented in Appendix D in order to determine why it received less than a perfect score for certain requirements. The text requirements with a score of less than 75 are discussed below in their order of importance. In addition, the primary deficiencies concerning the abstracts and coded fields are presented.

TABLE 1. SUMMARY OF SCORES^a FOR CALVERT CLIFFS 1, 2

	<u>Average</u>	<u>High</u>	<u>Low</u>
Text	8.3	9.5	7.1
Abstract	7.9	9.6	4.7
Coded Fields	8.6	9.7	6.0
Overall	8.2 ^b	9.1	6.9

a. See Appendix B for a summary of scores for each LER that was evaluated.

b. Overall Average = 60% Text Average + 30% Abstract Average + 10% Coded Fields Average.

Figure 1. Distribution of overall average LER scores

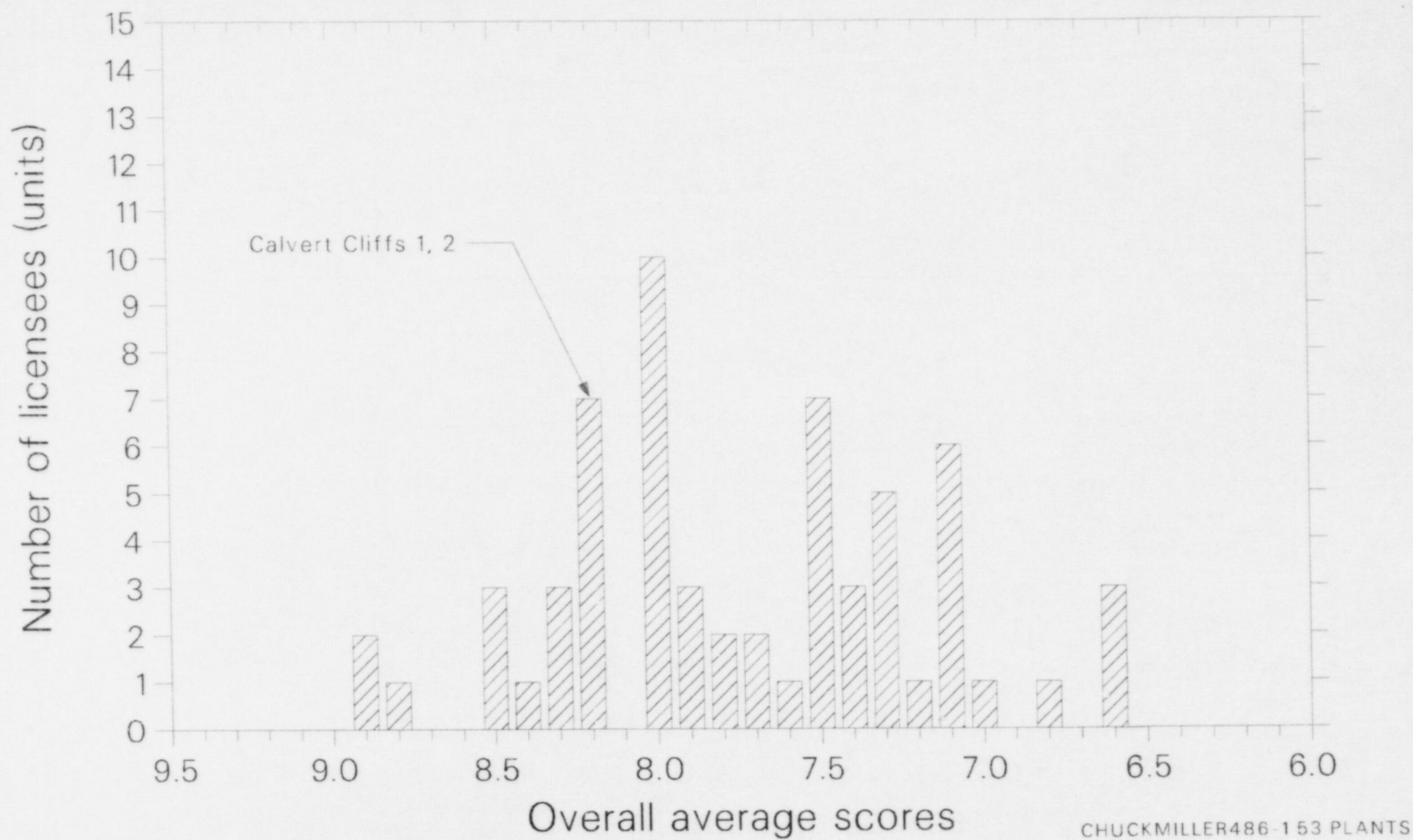


TABLE 2. LER REQUIREMENT PERCENTAGE SCORES FOR CALVERT CLIFFS 1, 2

<u>TEXT</u>		Percentage
Requirements [50.73(b)] - Descriptions		Scores () ^a
(2)(ii)(A) - - Plant condition prior to event		81 (16)
(2)(ii)(B) - - Inoperable equipment that contributed	b	
(2)(ii)(C) - - Date(s) and approximate times		91 (16)
(2)(ii)(D) - - Root cause and intermediate cause(s)		95 (16)
(2)(ii)(E) - - Mode, mechanism, and effect		97 (8)
(2)(ii)(F) - - EIIS Codes		84 (16)
(2)(ii)(G) - - Secondary function affected	b	
(2)(ii)(H) - - Estimate of unavailability		92 (6)
(2)(ii)(I) - - Method of discovery		94 (16)
(2)(ii)(J)(1) - Operator actions affecting course		90 (7)
(2)(ii)(J)(2) - Personnel error (procedural deficiency)		82 (9)
(2)(ii)(K) - - Safety system responses		77 (10)
(2)(ii)(L) - - Manufacturer and model no. information		75 (8)
(3) - - - - - Assessment of safety consequences		66 (16)
(4) - - - - - Corrective actions		89 (16)
(5) - - - - - Previous similar event information		91 (16)
(2)(i) - - - - Text presentation		75 (16)
<u>ABSTRACT</u>		Percentage
Requirements [50.73(b)(1)] - Descriptions		Scores () ^a
- Major occurrences (Immediate cause and effect information)		95 (16)
- Description of plant, system, component, and/or personnel responses		77 (7)
- Root cause information		81 (16)
- Corrective Action information		71 (16)
- Abstract presentation		69 (16)

TABLE 2. (continued)

CODED FIELDS	
Item Number(s) - Description	Percentage Scores () ^a
1, 2, and 3 - Facility name (unit no.), docket no. and page number(s)	100 (16)
4 - - - - - Title	57 (16)
5, 6, and 7 - Event date, LER No., and report date	100 (16)
8 - - - - - Other facilities involved	99 (16)
9 and 10 - - Operating mode and power level	92 (16)
11 - - - - - Reporting requirements	99 (16)
12 - - - - - Licensee contact information	100 (16)
13 - - - - - Coded component failure information	97 (16)
14 and 15 - - Supplemental report information	84 (16)

a. Percentage scores are the result of dividing the total points for a requirement by the number of points possible for that requirement.
(Note: Some requirements are not applicable to all LERs; therefore, the number of points possible was adjusted accordingly.) The number in parenthesis is the number of LERs for which the requirement was considered applicable.

b. A percentage score for this requirement is meaningless as it is not possible to determine from the information available to the analyst whether this requirement is applicable to a specific LER. It is always given 100% if it is provided and is always considered "not applicable" when it is not.

The safety assessments for six of the LERs were found to be deficient and four of the LERs did not include a safety assessment. A detailed safety assessment is required in all LERs and should include three items as follows:

1. An assessment of the consequences and implications of the event including specifics as to why it was concluded that there was no safety problem, if applicable. It is inadequate to state "this event had no safety consequences or implications" without explaining how that conclusion was reached.
2. A safety assessment should discuss whether the event could have occurred under a different set of conditions where the safety implications would have been more severe. If the conditions during the event are considered the worst probable, the LER should state so.
3. Finally, a safety assessment should name other systems that were available to perform the function of the safety system that was unavailable during the event.

The manufacturer and model number (or other unique identification) was not provided in the text of two of the eight LERs that involved a component failure, requirement 50.73(b)(2)(ii)(L). One way of determining whether or not you should include component identification information in the text is to ask the following question: "If I were reading this report, would I want to know whether or not I had this component (and thus the same potential for failure) at my station?" If the answer is yes, the component should be properly identified in the text as this information could lead to the identification of a problem that may be generic to the industry.

The text presentation received an overall score of 72%. A suggested method to improve the text presentation is the use of a consistent text outline. For example, a basic outline that would aid in ensuring each LER meets the requirements of 50.73(b) would include sections such as: event

description, reportability, cause, safety assessment, corrective actions, and similar occurrences. If applicable, other sections such as: background, time sequences, plant and/or system responses, system descriptions or generic implications can be added. Once a basic outline is adopted by all those responsible for writing LERs, the overall quality of the reports will improve, based simply on the fact that every LER will contain at least the minimum information concerning the major elements of each event.

The use of diagrams such as was provided in LER 85-004-00 is a good practice and is encouraged whenever appropriate. A figure was included in LER 85-011-00 for Unit 2 but not in LER 85-011-01. Revisions are required to contain all unrevised information from the original report as well as the new information.

The primary deficiencies for the abstracts involve the summary of the corrective action and the plant and system response information. Four LERs did not adequately summarize the corrective actions that had been discussed in the text, and three LER abstracts did not include any corrective actions. Three of the 7 LERs that provided responses in the text were considered to be deficient in that the abstract failed to adequately summarize the responses. Corrective actions information should be summarized in every abstract and plant, systems, and/or personnel responses should be summarized whenever they are discussed in the text.

In addition, the abstracts were considered marginal in the area of presentation in that three abstracts were very brief and failed to contain the necessary information even though space was available for more details. Two abstracts also contained information that was not discussed in the text. This should be checked for during the final review process and when found, the text should be revised to include such information.

The main deficiency in the area of coded fields involves the title, Item (4). Twelve of the 16 titles do not indicate root cause, three fail to include the link (i.e., circumstances or conditions which tie the root

cause to the result), and one fails to provide information concerning the result of the event (i.e., why the event was required to be reported). LER 85-004-00 had no title at all. While the result is considered the most important part of the title, cause and link must be included to make a title complete. An example of a title that only addresses the result might be "Reactor Scram". This is inadequate in that the cause and link are not provided. A more appropriate title might be "Inadvertent Relay Actuation During Surveillance Test LOP-1 Causes Reactor Scram". From this title the reader knows the cause involved either personnel or procedures and testing contributed to the event.

Table 3 provides a summary of the areas that need improvement for the station's LERs. For additional and more specific information concerning deficiencies, the reader should refer to the information presented in Appendices C and D. General guidance concerning these requirements can be found in NUREG-1022, Supplement No. 2.

TABLE 3. AREAS MOST NEEDING IMPROVEMENT FOR CALVERT CLIFFS 1, 2 LERs

Areas	Comments
Safety assessment	A discussion of safety implications of the event should be included in all LERs. The discussion should include the effect of the event on the plant, as well as, the availability of backup systems and the consequences of the event had it occurred under a more severe set of initial conditions.
Manufacturer and model number information	Component identification information should be included in the text for each component failure or whenever a component design is suspected of contributing to the event.
Text presentation	A consistent outline format is recommended for use by all personnel writing LERs at the station.
Abstracts	Corrective action and plant and system response information was often inadequate or was not included. Abstracts should summarize the information that is discussed in the text. If it is necessary to include additional information in the abstract, the text should be revised so as to discuss it.
Coded fields	<p data-bbox="168 1459 634 1491">a. Titles</p> <p data-bbox="789 1459 1372 1661">Titles should be written such that they better describe the event. In particular, the result and root cause of the event and the link between them should be included in all titles.</p>

REFERENCES

1. B. S. Anderson, C. F. Miller, B. M. Valentine, An Evaluation of Selected Licensee Event Reports Prepared Pursuant to 10 CFR 50.73 (DRAFT), NUREG/CR-4178, March 1985.
2. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022, U.S. Nuclear Regulatory Commission, September 1983.
3. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 1, U.S. Nuclear Regulatory Commission, February 1984.
4. Office for Analysis and Evaluation of Operational Data, Licensee Event Report System, NUREG-1022 Supplement No. 2, U.S. Nuclear Regulatory Commission, September 1985.

APPENDIX A

LER SAMPLE SELECTION
INFORMATION
FOR CALVERT CLIFFS 1 AND 2

TABLE A-1. LER SAMPLE SELECTION FOR CALVERT CLIFFS 1, 2

<u>LER Sample Number</u>	<u>Unit Number</u>	<u>LER Number</u>	<u>Comments</u>
1	1	84-015-00	ESF
2	1	84-018-00	
3	1	85-002-00	SCRAM
4	1	85-004-00	ESF
5	1	85-008-00	SCRAM
6	1	85-009-00	SCRAM
7	1	85-011-00	ESF
8	1	85-013-00	
9	2	85-003-00	
10	2	85-005-00	ESF
11	2	85-006-00	
12	2	85-007-00	
13	2	85-010-01	
14	2	85-011-01	
15	2	85-012-00	SCRAM
16	2	85-013-00	ESF

APPENDIX B

EVALUATION SCORES OF
INDIVIDUAL LERS FOR CALVERT CLIFFS 1 AND 2

TABLE B-1. EVALUATION SCORES OF INDIVIDUAL LERs FOR CALVERT CLIFFS 1, 2

	LER Sample Number ^a															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Text	7.9	9.5	8.0	8.5	7.6	7.1	8.7	8.6	8.3	7.6	8.5	8.6	8.0	8.9	7.3	9.2
Abstract	8.5	7.9	6.4	5.0	9.2	5.7	9.5	7.9	4.7	8.8	7.5	9.6	8.8	9.4	8.7	8.5
Coded Fields	9.0	7.9	9.3	6.0	9.0	9.7	9.5	8.0	8.4	8.9	8.5	9.5	8.8	9.0	9.0	7.5
Overall	8.2	8.8	7.7	7.2	8.2	6.9	9.0	8.3	7.2	8.1	8.2	9.0	8.3	9.1	7.9	8.8

	LER Sample Number ^a														AVERAGE
	17	18	19	20	21	22	23	24	25	26	27	28	29	30	
Text	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.3
Abstract	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.9
Coded Fields	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.6
Overall	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.2

a. See Appendix A for a list of the corresponding LER numbers.

APPENDIX C

DEFICIENCY AND OBSERVATION
COUNTS FOR CALVERT CLIFFS 1 AND 2

TABLE C-1. TEXT DEFICIENCIES AND OBSERVATIONS FOR CALVERT CLIFFS 1, 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
50.73(b)(2)(ii)(A)--Plant operating conditions before the event were not included or were inadequate.		6 (16)
50.73(b)(2)(ii)(B)--Discussion of the status of the structures, components, or systems that were inoperable at the start of the event and that contributed to the event was not included or was inadequate.		0 (3)
50.73(b)(2)(ii)(C)--Failure to include sufficient date and/or time information.		3 (16)
a. Date information was insufficient.	2	
b. Time information was insufficient.	2	
50.73(b)(2)(ii)(D)--The root cause and/or intermediate failure, system failure, or personnel error was not included or was inadequate.		3 (16)
a. Cause of component failure was not included or was inadequate	2	
b. Cause of system failure was not included or was inadequate	0	
c. Cause of personnel error was not included or was inadequate.	1	
50.73(b)(2)(ii)(E)--The failure mode, mechanism (immediate cause), and/or effect (consequence) for each failed component was not included or was inadequate.		1 (8)
a. Failure mode was not included or was inadequate	1	
b. Mechanism (immediate cause) was not included or was inadequate	0	
c. Effect (consequence) was not included or was inadequate.	0	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
50.73(b)(2)(ii)(F)--The Energy Industry Identification System component function identifier for each component or system was not included.		3 (16)
50.73(b)(2)(ii)(G)--For a failure of a component with multiple functions, a list of systems or secondary functions which were also affected was not included or was inadequate.		0 (0)
50.73(b)(2)(ii)(H)--For a failure that rendered a train of a safety system inoperable, the estimate of elapsed time from the discovery of the failure until the train was returned to service was not included.		1 (6)
50.73(b)(2)(ii)(I)--The method of discovery of each component failure, system failure, personnel error, or procedural error was not included or was inadequate.		1 (16)
a. Method of discovery for each component failure was not included or was inadequate	1	
b. Method of discovery for each system failure was not included or was inadequate	0	
c. Method of discovery for each personnel error was not included or was inadequate	0	
d. Method of discovery for each procedural error was not included or was inadequate.	0	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
50.73(b)(2)(ii)(J)(1)--Operator actions that affected the course of the event including operator errors and/or procedural deficiencies were not included or were inadequate.		2 (7)
50.73(b)(2)(ii)(J)(2)--The discussion of each personnel error was not included or was inadequate.		5 (9)
a. OBSERVATION: A personnel error was implied by the text, but was not explicitly stated.	2	
b. 50.73(b)(2)(ii)(J)(2)(i)--Discussion as to whether the personnel error was cognitive or procedural was not included or was inadequate.	2	
c. 50.73(b)(2)(ii)(J)(2)(ii)--Discussion as to whether the personnel error was contrary to an approved procedure, was a direct result of an error in an approved procedure, or was associated with an activity or task that was not covered by an approved procedure was not included or was inadequate.	0	
d. 50.73(b)(2)(ii)(J)(2)(iii)--Discussion of any unusual characteristics of the work location (e.g., heat, noise) that directly contributed to the personnel error was not included or was inadequate.	0	
e. 50.73(b)(2)(ii)(J)(2)(iv)--Discussion of the type of personnel involved (i.e., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) was not included or was inadequate.	1	

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
50.73(b)(2)(ii)(K)--Automatic and/or manual safety system responses were not included or were inadequate.		5 (10)
50.73(b)(2)(ii)(L)--The manufacturer and/or model number of each failed component was not included or was inadequate.		2 (8)
50.73(b)(3)--An assessment of the safety consequences and implications of the event was not included or was inadequate.		10 (16)
a. OBSERVATION: The availability of other systems or components capable of mitigating the consequences of the event was not discussed. If no other systems or components were available, the text should state that none existed.	2	
b. OBSERVATION: The consequences of the event had it occurred under more severe conditions were not discussed. If the event occurred under what were considered the most severe conditions, the text should so state.	4	
50.73(b)(4)--A discussion of any corrective actions planned as a result of the event including those to reduce the probability of similar events occurring in the future was not included or was inadequate.		5 (16)

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
a. A discussion of actions required to correct the problem (e.g., return the component or system to an operational condition or correct the personnel error) was not included or was inadequate.	2	
b. A discussion of actions required to reduce the probability of recurrence of the problem or similar event (correct the root cause) was not included or was inadequate.	2	
c. OBSERVATION: A discussion of actions required to prevent similar failures in similar and/or other systems (e.g., correct the faulty part in all components with the same manufacturer and model number) was not included or was inadequate.	0	
50.73(b)(5)--Information concerning previous similar events was not included or was inadequate.		2 (16)

TABLE C-1. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
<u>50.73(b)(2)(i)--Text presentation inadequacies.</u>		4 (16)
a. OBSERVATION: A diagram would have aided in understanding the text discussion.	0	
b. Text contained undefined acronyms and/or plant specific designators.	1	
c. The text contains other specific deficiencies relating to the readability.	3	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which the requirement was considered applicable.

TABLE C-2. ABSTRACT DEFICIENCIES AND OBSERVATIONS FOR CALVERT CLIFFS 1, 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph	Paragraph
	Totals ^a	Totals () ^b
A summary of occurrences (immediate cause and effect) was not included or was inadequate		1 (16)
A summary of plant, system, and/or personnel responses was not included or was inadequate.		3 (7)
a. Summary of plant responses was not included or was inadequate.	1	
b. Summary of system responses was not included or was inadequate.	2	
c. Summary of personnel responses was not included or was inadequate.	2	
A summary of the root cause of the event was not included or was inadequate.		7 (16)
A summary of the corrective actions taken or planned as a result of the event was not included or was inadequate.		7 (16)

TABLE C-2. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
Abstract presentation inadequacies		5 (16)
a. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text, therefore, the text should discuss all information summarized in the abstract.	2	
b. The abstract was greater than 1400 characters	0	
c. The abstract contains undefined acronyms and/or plant specific designators.	0	
d. The abstract contains other specific deficiencies (i.e., poor summarization, contradictions, etc.)	4	

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more deficiency or observation. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

TABLE C-3. CODED FIELDS DEFICIENCIES AND OBSERVATIONS FOR
CALVERT CLIFFS 1, 2

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
Facility Name		0 (16)
a. Unit number was not included or incorrect.		
b. Name was not included or was incorrect.		
c. Additional unit numbers were included but not required.		
Docket Number was not included or was incorrect.		0 (16)
Page Number was not included or was incorrect.		0 (16)
Title was left blank or was inadequate		15 (16)
a. Root cause was not given in title	13	
b. Result (effect) was not given in title	2	
c. Link was not given in title	4	
Event Date		0 (16)
a. Date not included or was incorrect.		
b. Discovery date given instead of event date.		
LER Number was not included or was incorrect		0 (16)
Report Date		0 (16)
a. Date not included		
b. OBSERVATION: Report date was not within thirty days of event date (or discovery date if appropriate).		
Other Facilities information in field is inconsistent with text and/or abstract.		1 (16)
Operating Mode was not included or was inconsistent with text or abstract.		3 (16)

TABLE C-3. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
Power level was not included or was inconsistent with text or abstract		1 (16)
Reporting Requirements		1 (16)
a. The reason for checking the "OTHER" requirement was not specified in the abstract and/or text.	0	
b. OBSERVATION: It may have been more appropriate to report the event under a different paragraph.	0	
c. OBSERVATION: It may have been appropriate to report this event under an additional unchecked paragraph.	1	
Licensee Contact		0 (16)
a. Field left blank		
b. Position title was not included		
c. Name was not included		
d. Phone number was not included.		
Coded Component Failure Information		1 (16)
a. One or more component failure sub-fields were left blank.	0	
b. Cause, system, and/or component code is inconsistent with text.	0	
c. Component failure field contains data when no component failure occurred.	1	
d. Component failure occurred but entire field left blank.	0	

TABLE C-3. (continued)

Description of Deficiencies and Observations	Number of LERs with Deficiencies and Observations	
	Sub-paragraph Totals ^a	Paragraph Totals () ^b
Supplemental Report		3 (16)
a. Neither "Yes"/"No" block of the supplemental report field was checked.	1	
b. The block checked was inconsistent with the text.	2	
Expected submission date information is inconsistent with the block checked in Item (14).		1 (16)

a. The "sub-paragraph total" is a tabulation of specific deficiencies or observations within certain requirements. Since an LER can have more than one deficiency for certain requirements, (e.g., an LER can be deficient in the area of both date and time information), the sub-paragraph totals do not necessarily add up to the paragraph total.

b. The "paragraph total" is the number of LERs that have one or more requirement deficiencies or observations. The number in parenthesis is the number of LERs for which a certain requirement was considered applicable.

APPENDIX D

LER COMMENT SHEETS FOR
CALVERT CLIFFS 1 AND 2

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
1. LER Number: 84-015-00	
Scores: Text = 7.9 Abstract = 8.5 Coded Fields = 9.0 Overall = 8.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(H)</u>--When was the saltwater system capable of being restarted? 2. <u>50.73(b)(2)(ii)(J)(1)</u>--The operators continually switched between circulating pumps 11, 12, 13, and 14 in accordance with 01-38A, but it is not clear how this would help. Is one minute usually sufficient for the screens to become unclogged? 3. <u>50.73(b)(2)(ii)(K)</u>--As a minimum, list the safety systems which functioned as expected following the trip. 4. <u>50.73(b)(4)</u>--A supplemental report appears to be needed to describe the results of the evaluation and long term corrective actions. Without a commitment to submit a supplemental report, this LER must be considered incomplete. The corrective actions also do not indicate what was done to restore the saltwater system to operation (i.e., what was done immediately to remove the remaining fish from the intake)? 5. Attachment 1 was not included with the LER; any information pertinent to the LER should be included on Form 366A as part of the LER.
Abstract	<ol style="list-style-type: none"> 1. The sheared pins should be mentioned.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Link is not included. Indicate that the fish were impinged against the traveling screens. 2. <u>Item (14)</u>--The block checked is inconsistent with information in the text (see text Comment 4).

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
2. LER Number: 84-018-00	
Scores: Text = 9.5 Abstract = 7.9 Coded Fields = 7.9 Overall = 8.8	
Text	1. No comment.
Abstract	<p>1. <u>50.73(b)(1)</u>--Summary of root cause of the seal failure is not included.</p> <p>2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. The abstract should state that the seals were replaced with a superior seal material and that this, plus periodic seal replacement, should reduce the probability of recurrence.</p>
Coded Fields	<p>1. <u>Item (4)</u>--Title: Root cause of the excessive leakage is not included.</p> <p>2. <u>Item (9)</u>--Operating mode is not included.</p> <p>3. <u>Item (14)</u>--Neither "Yes"/"No" block of the supplemental report field is checked.</p>

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
3. LER Number: 85-002-00	
Scores: Text = 8.0 Abstract = 6.4 Coded Fields = 9.3 Overall = 7.7	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(J)(2)</u>--Discussion of personnel error is inadequate. It is not apparent from the discussion whether or not the reclosing of the breaker was considered a personnel error as well. Could the system have been placed back in service without causing the feed pumps to lose suction and in time to prevent a reactor trip from some other parameter? 2. <u>50.73(b)(2)(ii)(K)</u>--Discussion of automatic and/or manual safety system responses is inadequate. The safety systems that "functioned as expected" should be named in the text. 3. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included; although, some credit was given for the statement that all safety systems functioned as expected. 4. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. Will both the opening and reclosing of breakers be reviewed with the watchstanders or just the opening? See comment number 1. The actual label for the air compressor breaker is not clear from the text; should some consideration be given to changing the label for one or both of the breakers in question?
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of system and personnel responses after the trip is not included. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. 3. Abstract contradicts the text. The scram time is "1658" in the abstract while the text says "1615".

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
3. LER Number: 85-002-00 (continued)	
	4. Abstract does not adequately summarize the text (corrective actions). Additional space is available within the abstract field to provide the necessary information but it was not utilized.
Coded Fields	1. <u>Item (4)</u> --Title: Root cause (personnel error) is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
4. LER Number: 85-004-00	
Scores: Text = 8.5 Abstract = 5.0 Coded Fields = 6.0 Overall = 7.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(J)(2)(iv)</u>--Discussion of the type of personnel involved (i.e., contractor personnel, utility licensed operator, utility nonlicensed operator, other utility personnel) is inadequate. Be more specific about the type of operators involved. 2. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is inadequate. The safety assessment should be specific as to why there was no threat to the public and the plant. OBSERVATION: The consequences of the event had it occurred under more severe conditions should be discussed. If the event occurred under what are considered the most severe conditions, the text should so state. 3. <u>50.73(b)(5)</u>--Information concerning previous similar events is not included. If no previous similar events are known, the text should so state. The corrective actions do mention prevention of a similar event in the future, but the intent of requirement 50.73(b)(5) is to identify previous similar events by LER number, if there are any.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is inadequate. The Lack of an adequate procedure should be mentioned. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title is not included. 2. <u>Item (9)</u>--Operating mode is not included. 3. <u>Item (10)</u>--Power level is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
5. LER Number: 85-008-00	
Scores: Text = 7.6 Abstract = 9.2 Coded Fields = 9.0 Overall = 8.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(D)</u>--The cause of the failed limit switch is not discussed. 2. <u>50.73(b)(2)(ii)(L)</u>--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included. 3. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included.
Abstract	<ol style="list-style-type: none"> 1. No comment.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
6. LER Number: 85-009-00	
Scores: Text = 7.1 Abstract = 5.7 Coded Fields = 9.7 Overall = 6.9	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(C)</u>--Time information for occurrences is inadequate. At what time was the plant placed in hot standby? 2. <u>50.73(b)(2)(ii)(J)(2)</u>--Discussion of personnel error is inadequate. <u>50.73(b)(2)(ii)(J)(2)(i)</u>--Discussion as to whether the personnel error was cognitive or procedural is not included. 3. <u>50.73(b)(2)(ii)(K)</u>--Discussion of automatic and/or manual safety system responses is not included. 4. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. 5. <u>50.73(b)(5)</u>--It seems unlikely that there have been no previous events that involved a reactor trip caused by improper manual feedwater control. The definition of "similar" for this event may be too restrictive. (Note: This is an observation; no points were deducted from this requirement.)
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of system responses after the scram is not included. 2. <u>50.73(b)(1)</u>--Summary of personnel error is not included. See text comment no. 2. 3. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is not included. 4. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract. 5. Abstract does not adequately summarize the text. Additional space is available within the abstract field to provide the necessary information but it was not utilized.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
6. LER Number: 85-009-00 (continued)	
Coded Fields	1. <u>Item (4)</u> --Title: Root cause (personnel error) is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
7. LER Number: 85-011-00	
Scores: Text = 8.7 Abstract = 9.5 Coded Fields = 9.5 Overall = 9.0	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(K)</u>--Discussion of automatic and/or manual safety system responses is inadequate. As a minimum list the major safety systems which actuated. 2. <u>50.73(b)(3)</u>--OBSERVATION: The consequences of the event had it occurred under more severe conditions should be discussed. If the event occurred under what are considered the most severe conditions, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. No comment.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Link (spurious feedwater high level signal) is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 1 (317)

Section	Comments
8. LER Number: 85-013-00	
Scores: Text = 8.6 Abstract = 7.9 Coded Fields = 8.0 Overall = 8.3	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--Discussion of plant operating conditions before the event is inadequate. Modes 1 and 5 are undefined. 2. <u>50.73(b)(2)(ii)(L)</u>--Identification (e.g. manufacturer and model no.) of the failed component(s) discussed in the text is not included. The weld failure appears to be a design error. In this case a manufacturer and model number is not appropriate. However, information concerning the design of the attachment point between the RCP and the CBO line should be included so that others can determine if the potential for a similar event exists at their unit.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of plant and personnel responses is inadequate. A statement should be included indicating that the RCS leakrate was increasing as shown by the decreasing time interval between reactor containment sump discharges. The first paragraph of the abstract implies that at 1200, Unit 1 commenced power reduction for shutdown, while the text states that reactor power reduction was commenced at 1630. 2. <u>50.73(b)(1)</u>--Summary of root cause is inadequate. It is not clear why the weld failed.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included. 2. <u>Item (9)</u>--Operating mode is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
9. LER Number: 85-003-00	
Scores: Text = 8.3 Abstract = 4.7 Coded Fields = 8.4 Overall = 7.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--Discussion of plant operating conditions before the event is inadequate. Mode 5 should be defined (e.g., cold shutdown). 2. <u>50.73(b)(2)(ii)(I)</u>--Discussion of the method of discovery of the single cracked stud is not included. 3. <u>50.73(b)(2)(ii)(J)(2)</u>--It appears that personnel error is involved in this event, but it is not discussed. What is the "evidence" that suggests inadequate control over the torquing of the studs? 4. <u>50.73(b)(4)</u>--The "approved substitute" for the 17-4 pH studs should be named. 5. Some ideas are not presented clearly (hard to follow); namely the last part of the first paragraph. 6. Some conclusions reached are inconsistent with the facts presented. Why were the cracked studs all of 17-4 pH material while the 316 stainless studs (wrong material) were found to be alright?
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of occurrences [immediate cause(s) and effects(s)] is inadequate. (Insufficient details.) 2. <u>50.73(b)(1)</u>--Summary of root cause is not included. 3. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Actions taken to prevent recurrence of the cracking were not summarized. 4. Abstract does not adequately summarize the text. Additional space is available within the abstract field to provide the necessary information but it was not utilized.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
9. LER Number: 85-003-00 (continued)	
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause and result are not included. 2. <u>Item (8)</u>--Calvert Cliffs 1 need not have been mentioned in this field as it was not directly affected by the occurrence (i.e., the cracked stud in Unit 2).

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
10. LER Number: 85-005-00	
Scores: Text = 7.6 Abstract = 8.8 Coded Fields = 8.9 Overall = 8.1	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--Discussion of plant operating conditions before the event is inadequate. The text should include the power level at which the plant was operating. 2. <u>50.73(b)(2)(ii)(C)</u>--Approximate time information for occurrences is inadequate. When was the system returned to service? 3. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 4. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is inadequate. Be specific as to why there were no safety consequences. For example, how did the fact that the plant was in normal operation contribute to safe operation during the event?
	<p>OBSERVATION: The consequences of the event had it occurred under more severe conditions should be discussed. If the event occurred under what are considered the most severe conditions, the text should so state.</p>
Abstract	<ol style="list-style-type: none"> 1. OBSERVATION: The abstract contains information not included in the text. The abstract is intended to be a summary of the text; therefore, the text should discuss all information summarized in the abstract. The last sentence in Paragraph 1 and the third paragraph provide information that is not discussed in the text.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause and link are not included. 2. <u>Item (13)</u>--Component failure field contains data when no component failure occurred.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
11. LER Number: 85-006-00	
Scores: Text = 8.5 Abstract = 7.5 Coded Fields = 8.5 Overall = 8.2	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is not included. OBSERVATION: The consequences of the event had it occurred under more severe conditions should be discussed. If the event occurred under what are considered the most severe conditions, the text should so state. 2. Some ideas are not presented clearly (hard to follow). What is the significance of 0800, May 29 (when both sources of emergency power are required)?
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is inadequate. Why did the connections develop cracks? 2. How was it determined that the interpolar connections were not required for proper operation of the generators?
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
12. LER Number: 85-007-00	
Scores: Text = 8.6 Abstract = 9.6 Coded Fields = 9.5 Overall = 9.0	
Text	<ol style="list-style-type: none"> 1. Submittal of an LER without a text is acceptable; however, the abstract must then meet all the requirements of a text and still be less than 1400 characters. The following comments apply to the abstract that was evaluated as if it were a text. 2. <u>50.73(b)(2)(ii)(F)</u>--The Energy Industry Identification System component function identifier(s) and/or system name of each component or system referred to in the LER is not included. 3. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is inadequate. If these samplers had been found not to be operable on 6/28/85, what would have been the consequences? OBSERVATION: The availability of other systems or components capable of mitigating the consequences of the event should be discussed. If no other systems or components are available, the text should so state. 4. <u>50.73(b)(5)</u>--Information concerning previous similar events is inadequate. Similar occurrences should not be specific to "this instrument". Similar occurrences should be more general, such as "other missed surveillances by Chemistry Personnel". 5. How many samplers are involved?
Abstract	<ol style="list-style-type: none"> 1. No comment.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause (oversight) is not included. The word "Monitor" in the title should be plural.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
13. LER Number: 85-010-01	
Scores: Text = 8.0 Abstract = 8.8 Coded Fields = 8.8 Overall = 8.3	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--A brief description of each operating mode number referred to in the text should be provided. 2. <u>50.73(b)(2)(ii)(D)</u>--When a cause cannot be determined at least give the actions taken to try to determine the cause. 3. <u>50.73(b)(3)</u>--Discussion of the assessment of the safety consequences and implications of the event is inadequate. How would a high setpoint affect safety if the system did experience a large pressure transient? OBSERVATION: The availability of other systems or components capable of mitigating the consequences of the event should be discussed. If no other systems or components are available, the text should so state.
Abstract	<ol style="list-style-type: none"> 1. No comment.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (11)</u>--OBSERVATION: It appears it would have been appropriate to also report this event under paragraph(s) 50.73(a)(2)(i). 2. Commitment to a supplemental report in Revision 0 was good.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
14. LER Number: 85-011-01	
Scores: Text = 8.9 Abstract = 9.4 Coded Fields = 9.0 Overall = 9.1	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--Discussion of plant operating conditions before the event is inadequate. Operating Modes are not defined. 2. All LERs are required to stand alone; therefore, LER revisions should include all unrevised information from the previous LER. For example, the revision references "Part 8 on attached drawing". The drawing is included in LER 85-011-00 but not the revision.
Abstract	<ol style="list-style-type: none"> 1. No comment.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
15. LER Number: 85-012-00	
Scores: Text = 7.3 Abstract = 8.7 Coded Fields = 9.0 Overall = 7.9	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(C)</u>--Date and time information for occurrences is inadequate. What was the date (time) of the restart and the previous outage (when the modification was made)? 2. <u>50.73(b)(2)(ii)(D)</u>--The root and/or intermediate cause discussion for the improper setpoint for the pressure switch in the SGFP turbine trip system is not included. 3. <u>50.73(b)(2)(ii)(E)</u>--Why is it not known for sure whether SGFP No. 21 tripped on high discharge pressure? 4. <u>50.73(b)(2)(ii)(J)(1)</u>--Discussion of operator actions that affected the course of the event is inadequate. Was SGFP control in manual or automatic at 0037 when the pump discharge pressure increased rapidly for the third time? 5. <u>50.73(b)(2)(ii)(J)(2)</u>--It appears that personnel error is involved in this event, but it is not discussed. What was the cause of the improper setpoint for the pressure switch? See comment No. 2. 6. <u>50.73(b)(2)(ii)(K)</u>--Discussion of automatic and/or manual safety system responses is inadequate. All the reactor safety systems that "functioned as expected" should be named. 7. <u>50.73(b)(3)</u>--The implications of the improper setpoint for the pressure switch are not adequately discussed. 8. <u>50.73(b)(4)</u>--Discussion of corrective actions taken or planned is inadequate. Given that a pressure switch was found to be set wrong in the referenced similar event (84-008), what corrective actions were taken to ensure that setpoints would be checked more often? If none are necessary, the discussion of corrective actions should explain why.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
15. LER Number: 85-012-00 (continued)	
Abstract	1. The abstract generally lacks a few details that would make it a better summary of the text.
Coded Fields	1. <u>Item (4)</u> --Title: Root cause is not included.

TABLE D-1. SPECIFIC LER COMMENTS FOR CALVERT CLIFFS 2 (318)

Section	Comments
16. LER Number: 85-013-00	
Scores: Text = 9.2 Abstract = 8.5 Coded Fields = 7.5 Overall = 8.8	
Text	<ol style="list-style-type: none"> 1. <u>50.73(b)(2)(ii)(A)</u>--A brief description of the operating mode numbers referred to in the text should be provided. 2. <u>50.73(b)(2)(ii)(F)</u>--The EIIS codes were not included for each component referred to in the text. 3. A supplemental report appears to be needed to describe the results of the review of operating procedures. Without a commitment to submit a supplemental report, this LER must be considered incomplete. 4. Acronym(s) and/or plant specific designator(s) are undefined. Although RCS is a fairly common acronym, it should be defined.
Abstract	<ol style="list-style-type: none"> 1. <u>50.73(b)(1)</u>--Summary of root cause is inadequate. Mention that the wrong section of the procedure was used. 2. <u>50.73(b)(1)</u>--Summary of corrective actions taken or planned as a result of the event is inadequate. Mention counseling of the operators.
Coded Fields	<ol style="list-style-type: none"> 1. <u>Item (4)</u>--Title: Root cause is not included and the result (effect) should be more specific. 2. <u>Item (14)</u>--The block checked is inconsistent with information in the text (see text comment 3).