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NUCLEAR ENERGY  
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August 18, 1989

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 3; Docket Nos. 50-317 & 50-318  
Combined Inspection Report Nos. 50-317/89-06; 50-318/89-06

REFERENCE: (a) Letter from Mr. J. P. Wiggins (NRC) to Mr. G. C. Creel (BG&E)  
dated July 21, 1989, same subject

Gentlemen:

Reference (a) forwarded NRC Region I Combined Inspection Report 89-06/06. Appendix A to Reference (a) is a Notice of Violation which cites a violation of requirements of 10 CFR 50.59 and Technical Specification 6.5.1.6. Specifically, a change of intent to one of our Operating Instructions was made without a written safety evaluation in accordance with 10 CFR 50.59 and without the review and approval of our Plant Operations and Safety Review Committee (POSRC) as required by Technical Specification 6.5.1.6. Enclosure (1) provides our response to the Notice of Violation, as required.

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

Very truly yours,

GCC/CDS/dlm

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
R. A. Capra, NRC  
S. A. McNeil, NRC  
W. T. Russell, NRC  
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## ATTACHMENT (I)

### **REPLY TO A NOTICE OF VIOLATION INSPECTION REPORT 50-317/89-06; 50-318/89-06**

Appendix A of NRC Region I Combined Inspection Report 50-317/89-06; 50-318/89-06 is a Notice of Violation (NOV) regarding 10 CFR 50.59 and Technical Specification requirements. Specifically, a change of intent to one of our Operating Instructions (OI) was made without a written safety evaluation in accordance with 10 CFR 50.59 and without the review and approval of our POSRC in accordance with Technical Specification 6.5.1.6. Below is our response to the NOV.

#### **1. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED**

We have revised the definition of "change of intent" in Calvert Cliffs Instruction (CCI)-101, "Calvert Cliffs Implementing Procedure Development and Control." Changes to all procedures are being performed in accordance with CCI-101. "Change of intent" is currently defined as "any change to a procedure beyond correction of an obvious typographical error." Changes to all procedures must be approved by two members of Plant Management Staff prior to review by POSRC. One of these persons must be a BG&E Supervisor from the affected discipline. The procedure change must then be reviewed by POSRC and approved by the Manager - CCNPP prior to implementation. The change to CCI-101 was intended as an interim change until a more detailed definition of "change of intent" was developed. The change was purposely intended to be overly conservative to assure that no additional violations of the Technical Specification requirement occurred.

#### **2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS**

We have developed a detailed set of screening criteria for "change of intent" and are presently in the process of incorporating this screening criteria into CCI-101. Those screening criteria are not as restrictive as the current, conservative definition, but still assure that procedural changes of intent are not allowed without the required POSRC review and approval. The new CCI-101 revision has obtained POSRC approval. We will train personnel on the new "change of intent" screening criteria prior to implementation of the revised CCI-101.

We are aware that a more rigorous safety assessment process is needed at Calvert Cliffs. As part of our Performance Improvement Plan, we are implementing an Action Plan to enhance and widen the safety evaluation/assessment process. The intent of this Action Plan is to instill a site-wide culture change to improve safety awareness and ensure written safety evaluations are completed, as appropriate. An expanded safety assessment screening process is being formalized as part of the Action Plan and will be proceduralized in the future. Use of the expanded screening process will assure that safety assessments focused on nuclear safety have been performed when necessary and adequately documented. The process will require the use of progressive screening criteria by personnel at different organizational levels.



ATTACHMENT (1)

REPLY TO A NOTICE OF VIOLATION  
INSPECTION REPORT 50-317/89-06; 50-318/89-06

We expect these initiatives will:

- o lead to further improvements in our safety assessment methods;
- o improve the safety consciousness of employees involved in plant activities; and,
- o lead to improved training on the performance of safety assessments.

3. DATE WHEN COMPLIANCE WAS ACHIEVED

Compliance was achieved when the POSRC review and 10 CFR 50.59 safety evaluation were completed for the noted configuration changes on May 11, 1989.