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July 19, 1989

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
Response to Inspection Report Nos. 50-317/89-200; 50-318/89-200

Gentlemen:

In our June 21, 1989 response to the subject inspection report, we addressed all unresolved items, as well as other concerns identified in the report. We also stated that we would provide a subsequent response to five additional concerns identified in the report. Our response 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,

GCC/LSL/dlm

Enclosure

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ENCLOSURE (1)

**CALVERT CLIFFS NUCLEAR POWER PLANT
FOLLOW-UP RESPONSE TO INSPECTION REPORT
50-317/89-200; 50-318/89-200**

In our initial response to the subject Inspection Report, we addressed all unresolved items, as well as other noted concerns. We also stated that we would provide a subsequent response to five additional concerns identified in the report. Finally, we are providing the estimated completion date for an Emergency Diesel Generator (EDG) Facility Change Request (FCR) 88-034 which was discussed in our June 21, 1989 response to Unresolved Item No. 12. This FCR (88-034) is expected to be complete by November 30, 1989.

The following is a summary of each additional concern, as well as our corrective actions.

1. The inspectors interviewed personnel from Operations to gain their perception of our maintenance group. The maintenance group was perceived by the Operations group as being effective in safety-related areas. However, several of the people interviewed felt the area of non-safety-related equipment maintenance needed improvement.

Corrective Action

We are continuing to take measures to improve both safety-related (SR) and non-safety-related (NSR) maintenance procedures, maintenance orders (MOs), post-maintenance testing, and the qualification of our craft.

For a majority of the maintenance performed on electrical and controls (E&C) equipment, generic procedures are used. These procedures have the same requirements for NSR equipment as they do for SR equipment. As part of our Procedure Upgrade Project, mechanical and E&C maintenance procedures affecting NSR equipment are being improved. This project, which is part of the Performance Improvement Plan, will continue to receive full management support and attention. Also, planners' guidelines are being written to ensure both mechanical and E&C MOs for NSR equipment provide adequate guidance for the worker.

Post-maintenance testing requirements for NSR equipment are being handled in the same manner as those for SR equipment. As discussed in our June 21, 1989 response, we have recently taken measures to improve our post-maintenance testing program. Finally, our mechanical maintenance on-the-job training qualification program is continuing to be upgraded. Contractor support is being used to enhance the qualifications of mechanical maintenance personnel and to certify that their skills, knowledge and abilities match the demands of assigned tasks.

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2. Some instances were noted in which overtime guidelines contained in our Calvert Cliffs Instruction (CCI) - 140 (Shift Staffing) were exceeded without obtaining the appropriate authorization.

Corrective Action

Our overtime authorization forms are required whenever an individual is to work more than 16 hours in any 24-hour period, or more than 24 hours in any 48-hour period, or more than 72 hours in any 7-day period. Our time records are tracked on a weekly 7-day payroll period vice "any 7-day period." Authorization forms were being completed when an individual was going to work greater than 72 hours in a payroll week; however, these forms were not always used when more than 72 hours was worked in a 7-day period.

Management has communicated to all site supervisors the expectations regarding control of overtime worked by personnel performing safety-related functions. This included the basis for the overtime requirements, and the need to effectively plan and control work with regard to personnel resources. Examples of the methods now employed to ensure that future instances of unauthorized overtime do not occur include: tracking of overtime by the maintenance clerks on a frequent basis to identify those who are approaching their overtime limits, and closer review of time sheets by Operations shift supervisors to identify impending problems and provide tighter control. Also, measures taken by management to better control and more carefully plan all work are helping supervision improve the control of excessive overtime.

3. Our Control Room Operators (CRO) logs were reviewed by the inspection team and found to be informative and to provide a clear chronology of events. Our CCI-114 (Plant Logs) was described as providing excellent detailed instructions for keeping logs. However, our CRO log entry detail was noted to be lacking in the action taken and final resolution of problems.

Corrective Action

We agree that a more detailed narrative needs to be included in the CROs Logs. Changes made to CCI-114 have provided better guidance on maintaining Operations Logs. Although improvements in the logs' narrative have been made, our expectations have not been fully met. We have recently reinforced our expectations for more detail in the Shift Supervisors Log, as well as the Control Room Operators Log. The General Supervisor and Assistant General Supervisor-Nuclear Operations are reviewing the Shift Supervisors and Control Room Operators Logs to ensure these expectations are being met. Feedback (both positive and negative) is provided to help support improved Operations log-keeping.

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4. The report identified eight cases of material deficiencies, of which none appeared to affect the operability of any system or component. In each case, a Maintenance Request (MR) was initiated by Calvert Cliffs to evaluate each identified deficiency. A conclusion was drawn by the team that additional emphasis on identifying and correcting similar material deficiencies was needed.

Corrective Action

Management has stressed, and is continuing to reinforce the need for all employees to document all deficiencies they identify through MRs and/or Non-Conformance Reports (NCR). The importance of evaluating deficiencies for their potential generic implications has been stressed by supervision. Also, as discussed in our June 21, 1989 response, all General Supervisors will reinforce the purpose and proper threshold of NCRs to their people.

As a standard practice, watchstanders write MRs and NCRs when they discover problems on their watchstation tours. Additionally, Operations system experts, along with the system engineers and maintenance technicians in various disciplines, are participating in System Circles to carefully review, walkdown, identify and correct problems with their assigned systems. These System Circles are part of our Performance Improvement Plan.

5. Instrument piping for the low-pressure side of Unit One main feedwater regulating valve differential pressure detectors (PDT-4516 and 4517) was not installed as shown on drawing 60-702-E, Revision 10. Errors were also noted in the instrument valve identification tagging for these detectors.

Corrective Action

The pipe configuration was a result of repairs made in January 1989, to correct Main Feed System instrument piping vibration concerns. The "as-built" conditions were not documented at the time of repair. The response to this specific problem was to implement the drawing change request (DCR) to reflect the "as-built" conditions in the field on the Unit One Feedwater Regulator Valve Differential Pressure Detectors.

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This instance of not incorporating the field change into the plant operations drawing (OM drawing 60-702-E) was further investigated to determine if additional discrepancies such as this might exist. The Unit One and Two Main Condensate and Main Feedwater System Turbine Building instrumentation was inspected to verify the respective OM drawing versus actual configurations. All pipe configuration were correct; however, an additional valve identification problem was found on a condensate discharge header flow detector which is used for indication only. Although the valve identification numbers were correct, the valves' titles relative to "upstream" versus "downstream" were reversed. This discrepancy is being corrected.

The following corrective actions have been or are being taken to address this concern.

- o Our Quality Assurance Procedure - 15 (Changes, Tests, and Experiments) has been revised to require Facility Change Requests for NSR components not described in the FSAR. This requires the use of our FCR process for all plant modifications, and thereby ensures that follow-on documentation (i.e., DCRs) is tracked as part of the close-out process.
- o Although no additional piping configuration discrepancies were noted during the first set of walkdowns, further walkdowns will be performed. These will focus on a sample of instrument isolation valves and vent/drain configurations. These walkdowns will be done on a system-by-system basis using our System Circle program. The first phase of screenings is expected to be complete by March 31 1990. Each discrepancy will be documented and resolved using the appropriate corrective action process (i.e., MOs, NCRs, DCRs, etc.). The overall results of the sampling will be evaluated to determine if additional action is necessary.
- o Finally, as discussed in our June 21, 1989 response, our Performance Improvement Plan includes the development of a multi-layered approach to the safety assessment of all activities (e.g., maintenance, modifications, and troubleshooting).