

BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.

V. P. PRESIDENT
SUPPLY

September 11, 1979

Division of Operating Reactors
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos. 50-317
50-318

Attention: Mr. Darrell G. Eisenhut,
Acting Director

Gentlemen:

This refers to your letter of June 26, 1979, in which you requested we review our policies and procedures regarding the testing of safety-related systems and the investigation of equipment failures. Such a review has been performed; the more salient points of this review are set forth below.

1. Throughout the period surveillance testing has been in effect at this facility (approximately five years), numerous revisions have been made to upgrade testing techniques to minimize the possibility of challenges to safety features and reactor protective systems.
2. Three members of the plant staff are assigned specific responsibilities regarding surveillance tests, which include the review and upgrading of procedures whenever it appears testing techniques can be improved to avoid challenges to the systems of concern.
3. The failure of a reactor protective or safety features component to actuate during testing is invariably investigated and reported as a Licensee Event Report. Such investigations are performed by staff engineers at the plant and assistance is rendered by the Engineering Department when required. These reports are reviewed by the Plant Operations and Safety Review Committee and by the Off-Site Safety Review Committee. The same level of review and investigation is performed for procedural inadequacies which cause the plant to be placed in a degraded mode of operation.

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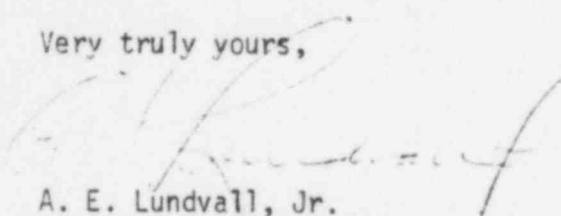
Mr. Darrell G. Eisenhut
Testing of Safety-Related Systems and
Investigation of Equipment Failures

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Based on the foregoing review, we believe our present policies and procedures provide adequate assurance that our testing program is implemented in a manner which minimizes challenges to the facility protective features and provides for a vigorous investigation and review of items which are found to be deficient. Additionally, as indicated by the continuous improvements we have made in our test procedures, we do not believe that a "sense of complacency" towards surveillance testing has ever existed; to the contrary, we believe our management policies have provided for a controlled and conscientious approach to testing which has contributed significantly to the safe, efficient operation of the facility.

We trust the above information satisfies the request set forth by your letter.

Very truly yours,



A. E. Lundvall, Jr.
Vice President - Supply

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