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VICE PRESIDENT
NUCLEAR ENERGY
(301) 260-4455

January 25, 1990

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: W. T. Russell

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Commitment Implementation Assessment Project

Dear Mr. Russell:

The Baltimore Gas and Electric Company has initiated a project to objectively assess how effectively we have historically identified, implemented, and maintained commitments made to the Nuclear Regulatory Commission (NRC). This project consists of four tasks and is described in the attached scope document.

We will complete this assessment, determine the safety significance of any deviations identified, and resolve mode-change restraining issues, as appropriate. Finally, we will present these results to and obtain the concurrence of the Regional Administrator prior to restart.

At the conclusion of this near-term project, we will develop our detailed plan and schedule for the comprehensive and long-term licensing commitment review effort described to NRC Region I staff at the January 18 enforcement conference. This will be submitted to you by April 30, 1990.

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

Very truly yours,

GCC/BSM/BDM/db

Attachment

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cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
J. E. Beall, NRC
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ATTACHMENT (1)
PROJECT SCOPE DOCUMENT

TITLE

This project shall be known as the "Commitment Implementation Assessment (CIA) Project".

GOAL

The goal of this project is to provide Calvert Cliffs management with an assessment of the company's historical ability to identify, implement and maintain licensee commitments made to the NRC.

RESPONSIBILITY

The Project Manager is L. E. Salyards, Principal Engineer of the Configuration Management Unit. The Assistant Project Manager is B. D. Mann of the Licensing Unit.

The project will report to the Manager, Nuclear Engineering Services until February 1, 1990, and to the Manager, Nuclear Safety and Planning thereafter.

METHOD

The goal shall be accomplished using four separate tasks. They are:

1. Representative Commitment Review: Perform an analysis of a representative set of approximately six large scope and 20 other issues containing licensee commitments to the Nuclear Regulatory Commission (NRC) to determine if commitments were identified, implemented and maintained properly.
2. Quality Assurance Audits: Identify all available Baltimore Gas and Electric Company (BG&E) Quality Assurance (QA) and Joint Utility Management Audit (JUMA) audits licensee commitments and provide an overall historical assessment of how QA views BG&E's ability to meet those commitments, including strengths and weaknesses.
3. NRC Inspection Reports: Identify and review all NRC Inspection Reports generated from NRC reviews of the implementation of licensee commitments resulting from the resolution of generic safety issues and provide an overall historical assessment of how the NRC views our ability to meet those commitments.
4. Industry Experience: Examine the efforts of other utilities who have performed the same type of review of licensee commitments to determine past utility and NRC expectations, suggested methods of analysis, and suggested acceptance criteria.

ATTACHMENT (I)
PROJECT SCOPE DOCUMENT

Any deficiencies noted in Tasks 1 - 3 which have not already been identified shall be reported using the Non-Conformance Report system. This project will not address resolution of outstanding commitments. However, the safety significance of any identified deficiencies shall be assessed.

DELIVERABLE

The results of the four tasks shall be reviewed and incorporated into a single report and a presentation to BG&E management which shall assess the historical ability of Calvert Cliffs programs and personnel to identify, implement and maintain licensee commitments. The report shall also make a subjective judgment on whether there are pervasive problems with our ability to identify, implement and maintain safety significant NRC commitments.

PROJECT SCHEDULE

| | |
|---|------|
| Develop Scope | 1/20 |
| Identify Project Manager, Asst. Project Manager and Task Managers | 1/20 |
| Receive Approval of Scope and Selected Issues | 1/22 |
| Select Task 1 Team Leaders and Team Members | 1/22 |
| Receive Task 1 Files from Licensing Unit | 1/24 |
| Summarize Task 1 Commitments from Issues | 1/25 |
| Complete Task 1 Commitment Review | 2/01 |
| Task 1 Team Reports Due to Asst. Project Manager | 2/03 |
| All Task Reports to Project Manager | 2/05 |
| Prepare Draft Report | 2/07 |
| Final Report Complete | 2/12 |
| Brief NRC on Results | TBD |

TASK DESCRIPTIONS

Task 1: Representative Commitment Review

Assistant Project Manager: Brian Mann, Engineer - Licensing Unit

Description:

Using several qualitative criteria, six representative large scope licensing issues and approximately 20 other licensing issues have been selected for review (see Enclosure 1). Each large scope issue is assigned to a team leader and the other licensing issues are divided between two team leaders. Another set of criteria shall be used to select approximately 60 commitments from the 6 large scope issues and approximately 40 commitments from the 20 other issues.

Each selected commitment shall be identified, documented and researched to ascertain if it was properly identified, implemented and maintained. Any commitments that were not identified, implemented or maintained shall be

ATTACHMENT (1)

PROJECT SCOPE DOCUMENT

reviewed to determine the safety significance of the commitment and an Non-Conformance Report (NCR) issue. Procedures shall be provided to the Team Leaders to ensure consistency as they assess safety significance of findings and as they document reviews.

The Team Leader, through the Assistant Project Manager, shall have the authority to assign responsibilities to General Supervisors and Principal Engineers as needed to accomplish their assigned tasks.

The Team Leaders shall provide the Assistant Project Manager with commitment description packages for each selected commitment and an assessment of how well BG&E identified, implemented and maintained the commitments. The Assistant Project Manager shall provide the Project Manager an overall assessment based upon the information in the Team Leaders' reports. Examples shall be incorporated as appropriate.

The responsibility of the Assistant Project Manager shall be to ensure that all issues are reviewed thoroughly and to a consistent level of detail, to resolve resource allocation and schedular difficulties, to keep the Project Manager informed of the progress of the task, to review the Team Leader reports and to prepare the task report.

Task 2: Quality Assurance Audits

Task Manager: Ana B. Anuje, Supervisor - Quality Audits Unit

Description:

Identify all available BG&E Quality Assurance and JUMA audits and review them for licensee commitments. When appropriate, show plant follow-up of identified deficiencies. Provide an overall assessment of how Quality Assurance views our historical ability to meet commitments. Include examples as appropriate.

Task 3: NRC Inspection Reports

Task Manager: Bruce Montgomery, Principal Engineer - Licensing Unit

Description:

Identify and review all NRC Inspection Reports from NRC inspections of Calvert Cliffs implementation of NRC requirements (i.e., Generic Letters, Bulletins, new regulations). Provide a Licensing Unit assessment of how the NRC has viewed our historical ability to identify, implement and maintain licensee commitments. Include examples as appropriate.

ATTACHMENT (I)
PROJECT SCOPE DOCUMENT

Task 4: Industry Experience

Task Manager: Stephen Kale - Consultant

Description:

Review the work of other utilities in commitment identification and verification to determine appropriate methods and format. Determine the utility's and NRC's expectations and suggest appropriate acceptance criteria for the project.

ENCLOSURE (1)

Selected Large Scope Issues

NUREG 0737,II.B.2
NUREG 0737,III.A.
NUREG 0737,II.F.1
10CFR50.62, GL 83-28
Bulletin 80-04
10CFR50.63

Plant Shielding
SPDS
Post Accident Monitoring
ATWS
Main Steam Line Break
Station Blackout

Candidate Other Issues

Generic Letter 88-05
Bulletin 88-01
Generic Letter 1/28/87
Bulletin 87-02
Generic Letter 87-08
Generic Letter 87-06

Generic Letter 86-06
Bulletin 85-01
Generic Letter 84-15

Generic Letter 84-13
Generic Letter 83-37
Generic Letter 83-14
Bulletin 83-3
Generic Letter 82-12
Generic Letter 81-14
Generic Letter 4/17/80

Bulletin 79-24
Generic Letter 12/21/79
Generic Letter 4/11/78
Bulletin 78-08

Boric Acid Corrosion of Stainless Steel Piping
Defects in Westinghouse Circuit Breakers
Requirements for Criminal History Checks
Fastener Tests
Implementation of 10CFR72.55 Search Requirements
Periodic Verification of Leak Tight Integrity of
Pressure Isolation Valves
Implementation of TMI Item II.K.3.5
Steam Binding AFW Pumps
Proposed Staff Actions to Improve and Maintain Diesel
Generator Reliability
Technical Specifications for Snubbers
NUREG 0737 Technical Specifications
Definition of Key Maintenance Personnel
Raw Water Failure Check Valves
Nuclear Power Plant Staff Working Hours
Seismic Qualification of AFW Systems
NRC Letter Regarding Certification of Personnel
Dosimetry Processors
Frozen Lines
Environmental Monitoring for Direct Radiation
NRC Guidance on Radiological Environmental Monitoring
Radiation Levels from Fuel Element Transfer Tubes