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May 10, 1991

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
Proposed Change to Quality Assurance Program

Gentlemen:

In accordance with 10 CFR 50.54(a)(3), on April 1, 1991, Baltimore Gas and Electric (BG&E) Company requested approval to change the Quality Assurance Program for Calvert Cliffs Units 1 and 2. The proposed change would transfer responsibility for the review of procurement documents from the Nuclear Quality Assurance Department (NQAD) to the recently created Procurement Engineering Unit within the Nuclear Support Services Department (NSSD).

Nuclear Regulatory Commission (NRC) approval is required prior to implementation of this change since the change was deemed to constitute a reduction in the Quality Assurance Program commitments as previously accepted.

During the NRC review of the proposed change, three potential concerns were brought to our attention regarding the wording on page 22 of the Quality Assurance Policy. These concerns were discussed in a phone conversation between NRC representative Fred L. Bower, III and BG&E's Kevin B. Cellars and are listed below.

1. The policy should clearly state that personnel reviewing procurement documents in NSSD and the Nuclear Engineering Department (NED) shall be qualified and trained in quality assurance program requirements.
2. The policy should state that personnel in NSSD and/or NED review safety-related and designated non-safety-related procurement documents to ensure the requirements stated therein are correct, inspectable, controllable, contain adequate acceptance and rejection criteria, and comply with the requirements of the procurement program.
3. The policy should state that the reviews and approvals on procurement documents are documented prior to placement of the purchase order.

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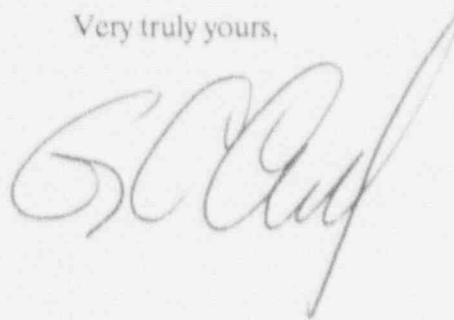
We propose to satisfy all three concerns by incorporating the comments onto page 22 of the Quality Assurance Policy as shown below.

"Qualified NSSD/NED personnel trained in quality assurance program requirements with RDO authority review safety-related and designated non-safety-related procurement documents for proper inclusion of technical and quality requirements. Personnel in NSSD/NED review safety-related and designated non-safety-related procurement documents to ensure that the requirements stated therein are correct, inspectable, controllable, contain adequate acceptance and rejection criteria, and comply with the requirements of the procurement program. These reviews and approvals are documented prior to placement of the purchase order."

Plant operation, in accordance with the proposed change, would continue to satisfy 10 CFR Part 50 Appendix B, Criterion 4, "Procurement Document Control."

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

Very truly yours,



GCC/KBC/dlm

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