

# Maryland Safe Energy Coalition

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Bruce A. Boger, Assistant Director, Region I Reactors  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Dear Mr. Boger:

SUBJECT: COMMENTS ON CALVERT CLIFFS' PERFORMANCE IMPROVEMENT PLAN

After careful review of the Calvert Cliffs Performance Improvement Plan and its Implementation Program, we want to register some of our concerns with you.

Our top priority is Safety. In both documents we are glad to read that safety and quality are Baltimore Gas and Electric (BG&E)'s most important goal, more important than production.

The documents go into great detail about proposed improvements in management, operations, accountability, verification, new training programs, better communication with other utility operations and other industry oversight groups. It is hard for an outsider to evaluate the proposed changes and determine whether they can be truly effectively implemented, or whether they turn out to be rhetoric. We wish to comment on a few areas in which we question the adequacy of the plans, or which we did not find covered at all.

1. Management Changes. We have read about the root causes of the problems at Calvert Cliffs (11 root causes, all of which BG&E admits to be of management origin), and have read other documents that give some insight into the established crony system of management that was so detached and uncommunicative with the operation of Calvert Cliffs. We question whether there has been enough NEW management or leadership added, and whether enough of the "old wood" has been pruned. Are there not qualified people available to replace those who have grown complacent? There was a rather thorough management "house cleaning" at all levels of the Philadelphia Electric Company and Peach Bottom Atomic Power Station recently that reportedly has improved worker morale at Peach Bottom.

2. Off-Site Safety Review Committee. We request that a representative of our citizens' organization become a permanent member of the utility's Off-Site Safety Review Committee. If part of the objective of this committee is to "pay attention to the 'people-side' of issues", we could certainly provide a responsible representative who is well informed and has good ideas.

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3. Circle Meetings. The "Circle" concept of improving team work, communication, and trouble-shooting is very good. We question whether only an annual meeting of the System Circle would be adequate. It would seem that it should meet at least quarterly so that problems could be identified and addressed more promptly.

4. Whistle-Blower Provisions. We found no provision to encourage anonymous alerts about unsafe conditions which workers may observe but might be fearful to identify in person. This should be a key provision for any operation that has such safety risks involved.

5. Remaining Modifications Required by TMI Review Committee. We note that BG&E has three incompleated modification requirements for both reactors resulting from NRC's assessment of safety inadequacies following the TMI accident. All three seem to be rather important (Control Room Design Review, Control Room Habitability, and Combustible Gas control), and we question the several years' delay in the implementation of modifications.

6. Emissions Monitoring. We strongly advocate that upgraded emissions monitoring by the utility be implemented before Calvert Cliffs is returned to service. We urge that real time monitoring operate at ALL reactor venting or effluent orifices. We also urge that real time monitoring be established at off-site locations radially from Calvert Cliffs, at 5 mile intervals, up to a 35 mile distance, with a greater concentration of monitoring stations in the predominant down-wind locations.

7. Emissions Monitoring. We urge BG&E to increase its funding to Maryland state agencies which monitor Calvert Cliffs' radioactive emissions to enable the state to conduct real time monitoring.

8. Emissions Monitoring. We request that BG&E provide funding for additional emissions monitoring stations for citizens' independent monitoring.

9. Emissions Reports Available. We request that a "hot line" phone be provided to answer citizen inquiries about the type and level of radioactive emissions being released by Calvert Cliffs at the moment of the inquiry.

10. Emissions Reports Available. We request that annual written summaries of records of radiation emissions vented, information collected by BG&E's monitoring of air, water, soil, sediment, vegetation, milk and seafood...both at on-site and off-site locations...be available on request by the public.

11. Emergency Evacuation Information. We request that BG&E provide better information about emergency evacuation and health-

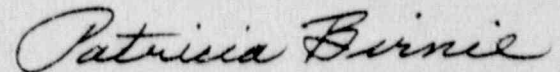
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protective measures individuals should take in case of serious releases of radiation.

12. Local & State Emergency Planning. We urge increased funding by BG&E to County and State agencies responsible for emergency procedures.

In conclusion, we must confess that nuclear power does not meet the common sense test for generating electricity. It is absurd that technical engineers could justify such a complicated and dangerous technology that threatens the human gene pool, and all life on earth, requires so many highly trained people to operate it, so many layers of safety systems, and generates a toxic waste product that we haven't devised a technology to isolate.

Respectfully yours,



Patricia Birnie,  
Co-Director

cc: George V. McGowan, Chairman of the Board, BG&E  
George C. Creel, V.P., Nuclear Energy, BG&E