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June 28, 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
Additional Information, Technical Specification Change Request:
Plant Operations and Safety Review Committee (POSRC),
(TAC Nos. 77616 and 77617)

REFERENCE: (a) Letter from Mr. G. C. Creel (BG&E) to Document Control Desk
(NRC), dated August 23, 1990, Technical Specification Change
Request: Plant Operations and Safety Review Committee (POSRC)

Gentlemen:

Reference (a) requested an amendment to Baltimore Gas and Electric Company's (BG&E's) Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 & 2, respectively. The two major changes involved the deletion of specific titles for members of the Plant Operations and Safety Review Committee (POSRC) and the use of a Procedure Review Committee or Qualified Reviewers to perform selected procedure reviews in lieu of review by POSRC. Other changes were also included.

This letter supplements the referenced submittal and is provided to reflect a change in BG&E's approach to procedural control associated with a major project for procedures upgrade, and to reflect initial comments from the NRC staff.

Reference (a) numbered and described 23 changes in the DESCRIPTION OF CHANGES section. Discussions follow addressing those that have been modified. The attached draft Technical Specification pages incorporate all proposed changes, with the modified areas identified. Only Unit 1 pages are provided. The Unit 2 pages contain identical information in the affected areas.

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CHANGE 3

Change 3 deleted specific titles for members of POSRC in Specification 6.5.1.2 and instead listed eight areas in which POSRC members will collectively have experience. The commitment to have at least one member who has a Senior Reactor Operator (SRO) license was also added. Of the eight areas in which the POSRC members must now collectively have experience, only Nuclear Operations would be expected to be filled by someone with an SRO license. However, that area will normally be covered by the Superintendent - Nuclear Operations, who is not required to hold an SRO license. In order to address this and to allow for flexibility in the POSRC composition area, an approach similar to that used for the Offsite Safety Review Committee (proposed Specification 6.5.4.2) has been used. The composition will consist of from seven to ten members. Specification 6.5.1.6, QUORUM, will require a majority of members for a quorum. The voting alternates limitation in Specification 6.5.1.4 has been moved to proposed Specification 6.5.1.6, QUORUM, and limits voting alternates, including an alternate chairman, to no more than half the quorum. These requirements are not significantly unlike those proposed by Reference (a). The eight areas the POSRC will have experience in are not changed. The qualifications for members and alternates are not changed.

Because the Plant General Manager will no longer be the Chairman of POSRC, the Plant General Manager has been added to proposed Specification 6.5.1.7.i, as an additional individual who shall be sent reports concerning investigations of violations of the Technical Specifications, and to proposed Specification 6.5.1.10, RECORDS, as an additional individual who shall be provided copies of POSRC meeting minutes.

CHANGE 8

Change 8 included adding the words "which affect nuclear safety" to modify the phrase, in proposed Specification 6.5.1.7, "Review of 1) all procedures required by Specification 6.8 which affect nuclear safety" This distinction is more appropriately made in Specification 6.8 itself. Therefore, the proposed words have been deleted in proposed Specification 6.5.1.7 and a new change made in Specification 6.8, excluding fire protection procedures which do not affect nuclear safety (and changes thereto), from required POSRC review.

CHANGE 9

Change 9 involved the renumbering of several associated specifications, mainly due to Change 10, which deleted present Specification 6.5.1.6.h. However, present Specification 6.5.1.6.h (now proposed 6.5.1.7.m) will not be deleted, and a new item, proposed Specification 6.5.1.7.h, discussing POSRC review of 10 CFR 50.59 Safety Evaluations, will be added to the series of items under POSRC responsibilities. Some of the Specifications under Change 9 are therefore renumbered again, along with references to them.

CHANGE 15

Change 15 added new specifications for the Procedure Review Committee and the Qualified Reviewer Program.

Proposed new specifications under Specification 6.5.2 for the Procedure Review Committee are slightly changed. For consistency with proposed Specification 6.5.3.1, the phrase "or Qualified

Reviewer" was added to proposed Specification 6.5.2.1 immediately following "in lieu of review by POSRC." For consistency with proposed Specification 6.5.1.8.c, a sentence was added addressing the Plant General Manager's responsibility for resolution of disagreements between the Procedure Review Committee and the approval authority.

New specifications under proposed Specification 6.5.3 for the Qualified Reviewer Program have also changed. Discussions follow.

The title itself has been changed to "QUALIFIED REVIEWERS." The word "PROGRAM" was deleted to provide consistency with other use of that term in site activities.

Proposed Specification 6.5.3.1, FUNCTION, has editorial changes.

Proposed Specification 6.5.3.2, RESPONSIBILITIES, addresses items that more appropriately belong under AUTHORITY, so the title was changed. Also, the approach reflected by Reference (a) envisioned a group of individuals who would perform a wide range of reviewer activities. A smaller group, performing a smaller range of activities, is now envisioned. Previously proposed Specification 6.5.3.2 provided for procedure review, cross disciplinary reviews, and screenings to determine whether 10 CFR 50.59 safety evaluations should be performed. The new proposed Specification 6.5.3.2, consistent with proposed Specification 6.5.2.7 for the Procedure Review Committee, provides only for procedure review and determinations with regard to whether or not each procedure reviewed constitutes an unreviewed safety question. Cross disciplinary reviews and 10 CFR 50.59 screenings will be performed by reviewers other than those addressed in the Technical Specifications. The requirement for cross-disciplinary reviews is maintained, however, placed in proposed Specification 6.5.1.7.a.

Proposed Specification 6.5.3.2.c was added to address disagreements between Qualified Reviewers and approval authorities. The approach is the same as that for POSRC and for the Procedure Review Committee.

Proposed Specification 6.5.3.3, AUTHORITY, has changed and is more appropriately titled CERTIFICATION. Previously, this section addressed (a) the designation of Qualified Reviewers, and (b) written recommendation to the approval authority of approval or disapproval of procedures. Item (b) is now addressed in proposed Specification 6.5.3.2. Item (a) remains, is changed, and needs discussion. Previously, the Qualified Reviewers were to be designated by the responsible approval authority. After further considerations, we believe the proper place for Qualified Reviewer designation (we now use "certification") is at the department manager position. This level is high enough that the importance of the certification is addressed, yet not so high or so far removed from the procedure subject area that the certification loses meaning.

Proposed Specification 6.5.3.4, RECORDS, has been renumbered 6.5.3.5 and has only editorial changes.

Proposed Specification 6.5.3.5, TRAINING AND QUALIFICATION, has been renumbered 6.5.3.4 and moved to CERTIFICATION along with proposed Specifications 6.5.3.3. The specific qualifications for Qualified Reviewers have been delineated.

CHANGE 16

Change 16 created a new Specification 6.8.2 that allowed the Plant General Manager to designate procedures to be reviewed by the Procedure Review Committee or a Qualified Reviewer. Minor editorial changes have been made, and an explicit requirement that these designations be made in writing has been added.

CHANGE 17

Change 17 addressed the splitting of present Specification 6.8.2. into new Specifications 6.8.3 and 6.8.4, which address approval authority and periodic review, respectively. Per Reference (a), approval authority was to be designated by the Plant General Manager and could be a Manager, a Superintendent, or a General Supervisor. Editorial changes have been made, and an explicit requirement that these designations be made in writing has been added. Also, approval authority has been changed to a Manager, a Superintendent, or a General Supervisor (or Director) that reports directly to a Manager.

An editorial change was made in Specification 6.8.4. The phrase "and administrative policy" was deleted. The referenced specification, 6.8.1, addresses procedures which control administrative and technical activities. It does not address administrative policies. The term "administrative policies" has a specific meaning in BG&E's new approach to procedures. To avoid confusion and to be more accurate, the phrase was deleted.

CHANGE 18

Change 18, addressing temporary procedure changes in proposed Specification 6.8.5, has minor editorial changes.

NOTE ON CHANGE 20

Change 20 discussed deletion of the word "written" in proposed Specification 6.5.1.8.b, but was not reflected in the marked-up pages attached to Reference (a). That change is still desired and is reflected in the changed pages attached herein.

SUMMARY

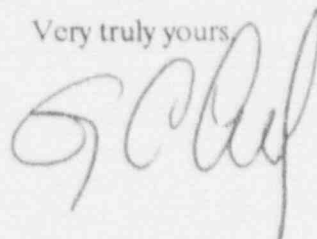
The items discussed in this letter are for the most part minor refinements to the approach to implementation of the key objectives of the originally requested amendment Reference (a). Those objectives were to no longer require specific supervisory positions as POSRC members and to establish a Procedure Review Committee and Qualified Reviewers. The arguments in the Determination of No Significant Hazards in Reference (a) are still valid with these refinements. All of the proposed changes are designed to strengthen POSRC and make it operate more effectively. POSRC will continue to represent the same areas of expertise and to meet the experience and training provisions of ANSI N18.1-1971. More emphasis can be placed on other matters of safety significance by the establishment of the Procedure Review Committee and Qualified Reviewers to review selected procedures as determined by the Plant General Manager. Both programs still describe what is to be reviewed and how this determination is made, will provide for inter-disciplinary

review of subject matter, document the review, and forward the recommendation to the appropriate member of management.

We appreciate your consideration of these changes. We feel that they are necessary to reflect the new approach to procedure control and that these Technical Specifications and those new controls will very positively affect the overall level of quality and excellence achieved at Calvert Cliffs.

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

Very truly yours



STATE OF MARYLAND :
: TO WIT :
COUNTY OF CALVERT :

I hereby certify that on the 28th day of June, 1991, before me, the subscriber, a Notary Public of the State of Maryland in and for Calvert County, personally appeared George C. Creel, being duly sworn, and states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements made are true and correct to the best of his knowledge, information, and belief; and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:

Michelle D. Hall
Notary Public

My Commission Expires:

February 2, 1994
Date

GCC/DLS/bjd/dlm

Attachments

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
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