BALTIMORE
GAS AND
ELECTRIC

1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

GEORGE C CREEL
VICE PRESIDENT
NUCLEAR ENERGY
(410) 260-4455

June 24, 1992

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 Policy

Gentlemen:

In accordance with 10 CFR 50.54(a)(3), Baltimore Gas and Electric Company (BG&E) hereby requests approval of a proposed revision to the Quality Assurance (QA) Program for the Calvert Cliffs Nuclear Power Plant. The proposed revision would clarify the regulatory controls that apply to changes to licensing documents. Specifically, controls for changes to the QA Program, Operating License (including Technical Specifications), Final Safety Analysis Report, Emergency Response Plan, and Security Plan would be governed by 10 CFR Paragraph 50.54(a)(3), 50.90, 50.71, 50.54(q), and 50.54(p), respectively, replacing 50.59 as the currently imposed control mechanism.

We propose to change the program as shown on the attached markup. Nuclear Regulatory Commission (NRC) approval is requested prior to implementation of this change since it could be deemed to constitute a reduction in commitments in the QA Program description previously accepted. The QA Program is also described in Section 1.B of the Calvert Cliffs Updated Final Safety Analysis Report (UFSAR). The UFSAR is updated annually in accordance with 10 CFR 50.71.

Presently, the QA Program states under Section 1B.3, DESIGN CONTROL,that "alterations to the Operating License, the UFSAR, and the Emergency Response Plan are subject to the same controls as are alterations to changes, tests, and experiments defined in 10 CFR 50.59." However, the 50.59 change process and the 50.59 evaluation standard (unreviewed safety question) are not always appropriate for the control of alterations to these licensing documents.

Specifically, amendments to the Operating License must be sought through the process specified in 10 CFR 50.90, applying the "no significant hazards" evaluation standard of 10 CFR 50.92. Changes to the UFSAR are controlled pursuant to 10 CFR 50.71 but may reflect inputs from a variety of sources, including safety evaluations for license amendments, 50.59 safety evaluations, QA Program changes, and the resolution of nuclear safety issues as reflected in BG&E correspondence with the NRC. Revisions to the QA P...y are made in accordance with 10 CFR 50.54(a)(3), and prior NRC approval is sought when a "reduction in commitment" is involved. Finally, alterations to the

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Emergency Response Plan and the Security Plan are made in accordance with 10 CFR 50.54(q), and 50.54(p), respectively, and prior NRC approval is sought when a "reduction in plan effectiveness" is involved.

This proposed change to the QA Policy would delete the paragraph under Section 1B.3 that presently imposes 50.59 controls on licensing document changes. New paragraphs would be added to the policy under Section 1B.6, DOCUMENT CONTROL, to specify the proper controls for these documents. Statements would also be added to Section 1B.2, QUALITY ASSURANCE PROGRAM, to further explain the change control process for the QA Policy. Finally, a minor editorial correction is being made to the first paragraph under Section 1.B.2 to delete two sentences that were incorrectly repeated in Revision 29.

Although we have determined that this change could be viewed as a reduction in a commitment previously made to the NRC, the revised QA Policy would continue to comply with the QA Program requirements of 10 CFR 50, Appendix B, Criteria 3 and 6. Changes, tests, and experiments would continue to be controlled by QA Program documents which are written to ensure compliance with 10 CFR 50.59, and new requirements would be added to ensure that changes to licensing documents are governed by the appropriate regulatory standards.

We request your approval of this change within 60 days of receipt of this letter. Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

GCC/BSM/bsm/dlm

Attachment: (1) Marked-up Quality Assurance Program Pages

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
J. G. Caruso, NRC
N. J. Blumberg, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC

Manager-Safety and Medical Services Department

The Manager-SMSD, is responsible for directing the efforts of SMSD personnel involved with medical examinations for CCNPP operators (10CFR55), Nuclear Security Officers (10CFR73), respirator users (10CFR20), and with the Fitness for Duty rule (10CFR26).

1B.2 QUALITY ASSURANCE PROGRAM

General Controls

The QA Program consists of the Updated Final Safety Analysis Report (UFSAR) Appendix 1B, QA Policy, Quality Assurance Procedures, certain Nuclear Program Directives and their implementing procedures. The UFSAR Appendix 1B and QA Policy are the same document except for the way changes are incorporated. The UFSAR Appendix 1B is updated annually. All changes approved during the year are incorporated during that update. ~~The UFSAR Appendix 1B is updated annually. All changes approved during the year are incorporated during that update.~~ The QA Policy is updated when each change is approved. INSERT A

The QA Policy identifies NRC regulatory requirements, industry standards, and specific codes applicable to the eighteen criteria contained in 10 CFR 50, Appendix B. The QA Policy also indicates action that will be taken by BG&E in response to these documents and to commitments made in the UFSAR and TSs for CCNPP.

Quality Assurance Procedures (QAPs) describe controls for the actions identified in the QA Policy. QAPs cover major activities related to operating a nuclear power plant, such as plant operation, plant maintenance, training, purchase of items and services, calibrations, etc.

Nuclear Program Directives address actions identified in UFSAR Appendix 1B. Directives identify regulatory commitments, management requirements, and assign responsibilities for each business function (i.e., design, maintenance, operations, etc.) within the BG&E Nuclear Program. As directives are written and implemented, they will systematically replace QAPs.

BG&E's QA Program for CCNPP is applied to structures, systems, components, and activities that have been designated SR because they prevent accidents or mitigate the consequences of postulated accidents that could cause undue risk to the health or safety of the public. The QA Program is also applicable to designated NSR structures, systems, components, activities, and services as required by in regulations. Designated NSR program requirements are based on a graded approach to Quality Assurance required to meet applicable regulatory designated requirements and guidance. The level of QA Program controls placed on designated NSR items are defined in QA Program documents and/or implementing procedures. The controls from other sections of this QA Policy are selected as necessary to meet the particular regulations being implemented.

Controls have been established for specifying on a Quality List (Q-List) all SR structures, systems, components, and activities that are subject to the requirements of the QA Program.

The Statement of Authority, in the Quality Assurance Manual for Nuclear Power Plants, signed by the Chairman of the Board, establishes the overall QA Policy of BG&E. This Statement sets the goal of safe and reliable operation of CCNPP, commits the Company to a QA Program designed to ensure the plant's compliance with regulatory requirements, BG&E commitments, and established practices for reliable plant operation; and requires every person involved in QA Program activities to comply with the provisions of the Program.

Procedural Controls

INSERT B

The QA Policy and revisions thereto are reviewed by Nuclear Program Managers. The Manager-NQAD reviews revisions to the QA Policy and recommends approval to the Vice President-Nuclear Energy Division. The Vice President-NED approves the QA Policy and revisions thereto.

Each Quality Assurance Procedure (QAP) is prepared by one or more of the Departments responsible for conducting the activity. The QAP and revisions thereto are reviewed by NED Managers and affected Department Managers. The Manager-NQAD ensures QAP revisions are reviewed by the Quality Assurance organization and recommends approval to the Vice President-NED. The Vice President-NED approves all QAPs and revisions thereto. The Manager-NSSD ensures issuance of all QAPs and revisions thereto. (1) One QAP controls the distribution and revision of the QA Policy and other QAPs.

Nuclear Program Directives are prepared under the direction of the Department Manager assigned by the Vice President-NED as the Program Sponsor. Each directive and revisions thereto are reviewed by affected Department Managers. The Manager-NQAD ensures directive revisions are reviewed by the Quality Assurance organization and approval recommended to the Program Sponsor. The Program Sponsor approves the directive and revisions thereto. The Manager-NSSD ensures issuance of all directives and revisions thereto.

QA Program documents ensure that:

1. The need for special controls, processes, test equipment, tools, and skills is specified when necessary to ensure that required quality is attained in performance of the activity.

2. Quality is verified by inspections and tests.

3. Personnel who perform activities affecting quality achieve and maintain suitable proficiency through appropriate training and experience.

Administrative or Technical Procedures are prepared as needed. They establish the processes used to implement directive or QAP requirements. The controls for review and issue of procedures are discussed in Sections 1B.5 and 1E.6.

Review of Operations

Procedures require that CCNPP shall be operated and maintained in accordance with the plant TSs and operating license. The following organizations review plant operations to ensure that these procedures are followed:

1. The Manager-NQAD provides independent verification that the requirements contained in the Plant's operating license, UFSAR, TSs, and plant procedures are met. This is accomplished through quality assurance audits.

2. The OSSRC provides independent verification by review that CCNPP is operated in accordance with established requirements. The OSSRC, which functions under a written Charter approved by the Vice President-Nuclear Energy Division, is composed of on-site and off-site personnel knowledgeable of in-plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, radiological safety, instrumentation and control systems, mechanical and electrical systems, quality assurance, and environmental factors. The proceedings of all meetings are documented and sent to the Vice President-Nuclear Energy Division, Committee members, and others designated by the Committee Chairman.

3. The on-site POSRC reviews matters pertaining to nuclear plant safety. This Committee screens subjects of potential concern to the OSSRC and performs preliminary investigations under the direction of the Plant General Manager. POSRC membership and functions are governed by Technical Specifications and written procedures. The results of all meetings are documented and sent to the members of the OSSRC, and others designated by the Committee Chairman.

The maintenance and repair of systems, structures, and components subject to the QA Program are performed by personnel under the direction of the General Supervisors of Electrical and Controls, Radiation Safety, and Mechanical Maintenance, according to written procedures and instructions as prepared by the maintenance force and approved as stated in QA Program documents. These Procedures:

1. Ensure that quality-related activities, such as inspections and tests, are performed with appropriate equipment and under suitable environmental conditions.

2. Indicate inspections and checks that must be made and records and data that must be kept.

3. Show where independent verifications of inspections or checks should be performed by specified personnel other than those performing the work.

When necessary, non-plant Company personnel or outside contractors are brought in to supplement the plant work force. In such instances, the approval of work procedures and the tagging of equipment are coordinated by a member of the BG&E organization responsible for the performance of the work.

Controls are established in QA Program documents to ensure that materials and parts used in the repair, maintenance, and modification of SR and designated NSR portions of the plant are appropriate for the service intended. Written procedures are prepared for the storage and identification of materials and parts to ensure that they do not deteriorate in storage and can be correctly identified before installation or use.

Equipment manufacturers and contractors used for the repair, maintenance, and modification of SR and designated NSR structures, systems, and components are required to have quality assurance programs consistent with the importance of the end-product to safety.

1B.3 DESIGN CONTROL

Control

Plant modifications described in the UFSAR and considered significant for nuclear safety are controlled by QA Program documents which are written to ensure compliance with Regulatory Guide 1.64 and 10 CFR 50.59.

Alterations to the Operating License, including TSs, the UFSAR and the Emergency Response Plan (ERP) are subject to the same controls as are alterations to changes, tests, and experiments defined in 10 CFR 50.59.

Controls for changes, tests, and experiments conducted at CCNPP vary according to the following:

1. As the item or activity affected is or is not described in the UFSAR.

2. As the item or activity affected has been classified SR or NSR.

1B.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Controls delineate the sequence of actions to be performed in the preparation, review, approval, and control of instructions, procedures, and drawings.

Controls require that:

1. Methods for complying with each of the applicable criteria of 10 CFR 50, Appendix B, must be specified in instructions, procedures, and drawings.

2. Instructions, procedures, and drawings must specify appropriate quantitative (such as dimensions, tolerances, and operating limits) and qualitative (such as workmanship samples) acceptance criteria for verifying that important activities have been satisfactorily accomplished.

Controls ensure that:

1. The QA Policy is approved by the Vice President-Nuclear Energy Division. (1)

2. QAPs are developed by Departments responsible for conducting particular activities, reviewed by the managers of the responsible department(s) for that particular activity, and approved by the Vice President-Nuclear Energy Division. (1)

3. Nuclear Program Directives are prepared under the direction of the Department Manager assigned as the Program Sponsor. Affected Department Managers review directives and their revisions. The Manager-NQAD ensures directives are reviewed by the Quality Assurance organization and approval recommended to the Program Sponsor. The responsible Program Sponsor approves directives and their revisions. Directives are prepared, reviewed, approved, and periodically reviewed according to an appendix to the Nuclear Program Directives Manual.

4. Procedures are prepared, approved, and controlled according to the Control Procedures. Control Procedures establish review, approval, revision, change, and periodic review requirements for applicable procedures. If format and content requirements are not contained in Control Procedures, they shall specify the document to be used to determine format and content requirements. Control Procedures are reviewed by the Quality Assurance Organization. Other procedures are reviewed by Quality Assurance on a requested basis.

5. Basis items added during procedure revisions or changes will be recorded. (1)

1B.6 DOCUMENT CONTROL

Requirements have been established to control the documentation of activities controlled by the QA Program. Controlled documents include the UFSAR for CCNPP; QA Program documents; procedures; specifications, and drawings.

INSERT C

QAPs are required to:

1. Establish controls to ensure that regulatory requirements and BG&E commitments will be implemented.

2. Describe interdepartmental interfaces and establish controls for interdepartmental activities.

INSERT A

Revisions to the QA Policy are controlled by QA Program documents which are written to ensure compliance with 10 CFR 50.54(a)(3).

INSERT B

QA Policy revisions are reviewed by NQAD personnel to determine if they constitute a reduction in commitments previously made to the NRC. If so, the revisions are sent to NRC for approval prior to further internal review.

INSERT C

Requirements have been established to control the documentation of activities controlled by the QA Program. QA Program controlled documents include the UFSAR; Operating License, including the Technical Specifications; Emergency Response Plan; Security Plan; QA Policy; procedures; specifications; and drawings.

Revisions to the QA Policy are controlled by QA Program documents which are written to ensure compliance with 10 CFR 50.54(a)(3).

Alterations to the UFSAR are controlled by QA Program documents which are written to ensure compliance with 10 CFR 50.71.

INSERT C (CONTINUED)

Alterations to the Operating License, including the Technical Specifications, are controlled by QA Program documents which are written to ensure compliance with 10 CFR 50.59(c), 10 CFR 50.90 and 10 CFR 50.92.

Alterations to the Emergency Response Plan are controlled by QA Program documents which are written to ensure compliance with 10 CFR 50.54(q).

Alterations to the Security Plan are controlled by QA Program documents which are written to ensure compliance with 10 CFR 50.54(p).