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Vice President  
Nuclear Energy

Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, Maryland 20657  
410 495-4455



May 1, 1996

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  
Supplement to Administrative Controls Section 6.0 Upgrade and Quality  
Assurance Policy Change

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- REFERENCES:
- (a) Letter from Mr. R. E. Denton (BGE) to NRC Document Control Desk, dated March 15, 1995, License Amendment Request: Administrative Controls Section 6.0 Upgrade and Quality Assurance Policy Change
  - (b) Letter from Mr. R. E. Denton (BGE) to NRC Document Control Desk, dated June 29, 1995, Supplement to License Amendment Request: Administrative Controls Section 6.0 Upgrade
  - (c) NUREG-1432, Standard Technical Specifications for Combustion Engineering Plants, Revision 1, April 1995
  - (d) NRC Administrative Letter 95-06, dated December 12, 1995, Relocation of Technical Specification Administrative Controls related to Quality Assurance

In Reference (a), Baltimore Gas and Electric Company requested a license amendment and also requested a change to the Quality Assurance Policy. Reference (b) supplemented that letter and replaced the original Determination of Significant Hazards discussion. This letter supplements the information provided in those References in order to make the proposed Technical Specifications more consistent with Reference (c), the Improved Technical Specifications (ITS), and in order to make the proposed Quality Assurance Policy changes more consistent with Reference (d).

These changes do not make the proposed Administrative Controls section identical to the Administrative Controls in Reference (c). Baltimore Gas and Electric Company will be submitting a license amendment request to convert the Calvert Cliffs Technical Specifications to the ITS format later this year. Any

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differences between the Calvert Cliffs ITS Administrative Controls and the proposed Administrative Controls section will be addressed in the ITS conversion submittal.

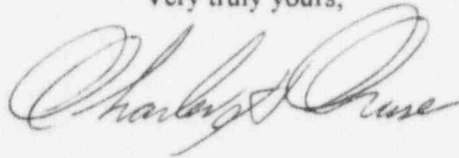
These changes make the proposed Administrative Controls section and proposed Quality Assurance Policy consistent with the guidance in Reference (d).

Attachment (1) describes the changes to the proposed Technical Specifications. Attachment (2) describes the changes to the proposed Quality Assurance Policy. Attachment (3) contains a revised Quality Assurance Policy incorporating the changes.

These changes do not affect the content or conclusions of the Determination of Significant Hazards provided in Reference (b).

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

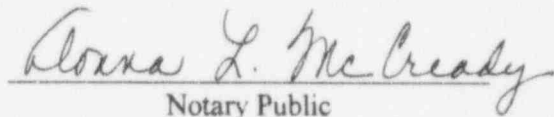
Very truly yours,



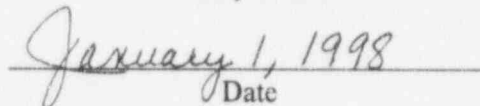
STATE OF MARYLAND :  
: TO WIT:  
COUNTY OF CALVERT :

I hereby certify that on the 15<sup>th</sup> day of May, 1996, before me, the subscriber, a Notary Public of the State of Maryland in and for Calvert County, personally appeared Charles H. Cruse, 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:

  
Notary Public

My Commission Expires:

  
Date

CHC/BDM/dlm

Attachments: (1) Changes to the Proposed Technical Specifications  
(2) Changes to the Quality Assurance Policy  
(3) Proposed Quality Assurance Policy

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
L. B. Marsh, NRC  
A. W. Dromerick, NRC

T. T. Martin, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR  
J. H. Walter, PSC

**ATTACHMENT (1)**

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**CHANGES TO THE PROPOSED TECHNICAL SPECIFICATIONS**

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## ATTACHMENT (1)

### CHANGES TO THE PROPOSED TECHNICAL SPECIFICATIONS

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1. Section 6.4.1, Procedures, of the proposed Technical Specifications was not entirely consistent with NUREG-1432, the Improved Standard Technical Specifications. Specifically, Baltimore Gas and Electric Company had included a requirement to have the procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, but did not include, "Quality assurance for effluent and environmental monitoring," or "Fire Protection Plan implementation." Baltimore Gas and Electric Company's position was that these procedure categories were included in those described in Appendix A of Regulatory Guide 1.33 [see Description of Change for Change 42 in Attachment (1) of Reference (a)]. However, in order to maintain consistency with NUREG-1432, Baltimore Gas and Electric Company will include, "Quality assurance for effluent and environmental monitoring," and "Fire Protection Plan implementation," as Items c. and d. in the proposed Section 6.4.1.
2. In the proposed Section 6.2.2.g.3, regarding Shift Technical Adviser (STA) requirements, we have added, "by the NRC," to the phrase, "an SOL holder previously approved as an exception to the minimum STA education requirements of Specification 6.3.1," so that it will read, "an SOL holder previously approved by the NRC as an exception to the minimum STA education requirements of Specification 6.3.1." This clarifies the requirement by stating who granted the exemption.
3. In the proposed Section 6.2.2.f, the sentence, "The supervisor, Shift Supervisor and Control Room Supervisor shall hold a senior reactor operator license," was in error. It should have stated, "The General Supervisor, Shift Supervisor and Control Room Supervisor shall hold a senior reactor operator license." This has been corrected.
4. In the proposed Section 6.3.1, "Facility Staff Qualifications," Baltimore Gas and Electric Company added a statement that additional exceptions to ANSI N18.1-1971 are contained in the Quality Assurance Policy. This change is inconsistent with the Improved Technical Specifications and was added only for clarity. Therefore, it is withdrawn.

**ATTACHMENT (2)**

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**CHANGES TO THE QUALITY ASSURANCE POLICY**

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## ATTACHMENT (2)

### CHANGES TO THE QUALITY ASSURANCE POLICY

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1. In Attachment (7) of Reference (a), Baltimore Gas and Electric Company provided the justifications for the proposed changes to the Quality Assurance Policy. Under Biennial Review of Procedures, we described 10 programs and processes which achieve the same desired outcome as periodic procedure reviews. Item 3 stated, "Control processes are in place that contain mechanisms for making procedure improvements. Additionally, control procedures for technical procedures require periodic review questions to be answered during every revision." We are currently pursuing a revision to our procedure control process which, among other changes, will not require that the periodic review questions be answered for technical procedure changes if the nature of those changes only requires a limited scope review. Notwithstanding this change, we believe that the control processes for making procedure improvements, in conjunction with the other nine programs and processes we described, will have the same outcome as periodic procedure reviews.
2. In Section 1B.5, Item 4, (page 24) which discusses Control Procedures, "periodic review" was restored, as Control Procedures will continue to specify periodic review requirements for non-routine event-driven procedures.
3. Also in Section 1B.5, Item b (page 25) under the discussion on temporary changes, the phrase, "knowledgeable in the areas affected by the procedures" was added to describe the two members of the plant staff who approve temporary changes.
4. In Section 1B.17 (now beginning on page 40), the existing Technical Specification 6.10, "Record Retention," requirements have been added, following the respective paragraphs for lifetime and non-permanent records.
5. Section 1B.18, Audit (now page 42), has been changed to include a reference to audit subjects in Regulatory Guide 1.33 (along with those specified in ANSI N18.7 and regulations); and to clarify that the other audit subjects (those being relocated from the Technical Specifications) will also be subject to a two-year audit frequency, with the exception of the inspection and audit of the fire protection and loss prevention program performed by a qualified outside fire consultant at least once per 36 months.
6. In Table 1B-1 (now beginning on page 43), ANSI N18.7/ANS 3.2-1976 Item 1 (where we document our exception to the procedure biennial review requirement) has been changed to include the considerations from the NRC staff's position on plant procedure review guidance.

A proposed version of the Quality Assurance Policy incorporating these changes is attached.

**ATTACHMENT (3)**

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**PROPOSED QUALITY ASSURANCE POLICY**

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