

JUN 20 1985

Docket Nos. 50-317
50-318

Baltimore Gas And Electric Company
ATTN: Mr. A. E. Lundvall, Jr.
Vice President, Supply
Charles Center
P.O. Box 1475
Baltimore, Maryland 21203

Gentlemen:

Subject: Combined Report Nos. 50-317/84-16 & 50-318/84-16

This refers to your letter dated August 23, 1984, in response to our letter dated July 24, 1984.

We have evaluated your response to Notice of Violation transmitted as Appendix A to our combined Inspection Report 50-317/84-16 and 50-318/84-16 and are withdrawing the Notice of Violation. We believe that the inspection did identify certain weaknesses in post modification action followup, while specifically not in violation of NRC regulations, which did require improvement. Based on discussions with our Resident Inspector, we note that you have been taking action to make such improvements. Our observation of this improvement has been documented in the Systematic Assessment of Licensee Performance (SALP) of Calvert Cliffs, Report Nos. 50-317/84-29 and 50-318/84-29, dated January 18, 1985 which, in part, states, "...significant progress was made in closing out Facility Change Request (FCR's) for work which was complete but action items still remained open (procedure changes, non-critical drawings, training, etc.)...". We will continue to monitor the adequacy of your completion of post modification action follow up items during future NRC inspections.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Stewart D. Ebnetter

Stewart D. Ebnetter, Director
Division of Reactor Safety

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cc:

R. M. Douglass, Manager, Quality Assurance
L. B. Russell, Plant Superintendent
M. E. Roberson, General Supervisor, Operations QA
Thomas Magette, Administrator, Nuclear Evaluations
R. C. L. Olson, Principal Engineer
J. A. Tiernan, Manager, Nuclear Power
R. E. Denton, General Supervisor, Training and Technical Services
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Maryland (2)

bcc:

Region I Docket Room (w/concurrences)
T. Elsasser, Chief, PB #3, Section #3C, DRP

DRS:RI
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5/21/85

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DRS:RI
Bettenhausen
5/23/85

DRS:RI
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04/18/85



CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

August 23, 1984

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos.	50-317
	50-318
License Nos.	DPR-53
	DPR-69

ATTENTION: Mr. Thomas T. Martin, Director
Division of Engineering & Technical Programs

Gentlemen:

The routine safety inspection transmitted by Inspection Report 50-317/84-16; 50-318/84-16, identified one item of apparent noncompliance with NRC Regulations. The apparent noncompliance concerned the control of informal punchlists used as an administrative mechanism for tracking outstanding items associated with our Auxiliary Feedwater System modifications project. A thorough review of our current Modifications Control system indicates that it adequately addresses the criteria of 10 CFR 50, Appendix B.

Calvert Cliffs Instruction (CCI)-126, Administrative Control of Facility Change Requests, meets the requirements of 10 CFR 50, Appendix B, Criterion V by providing the controlling procedures for accomplishing activities involving the modification of safety-related systems. These controls are structured to recognize the fact that certain identified deficiencies have an insignificant effect on the operability of a system in its post-modified state.

CCI-126 meets the goals specified in 10 CFR 50, Appendix B, Criterion V in the following manner.

- A. Prior to turning a modified system over to the Operations organization the following actions are taken.
 1. Any outstanding Maintenance Requests generated against the modification that could affect the operability of the system are verified to be complete.
 2. All post-modification testing, (e.g., Pre-Operational Tests, Technical Support Procedures, Functional Tests, Local Leak Rate Tests, Hydrostatic Pressure Tests), is verified to be complete as these tests relate to an adequate demonstration of operability and acceptability of results.
 3. All critical drawings (Control Room P&ID's) are verified to reflect the "As-Built" configuration.

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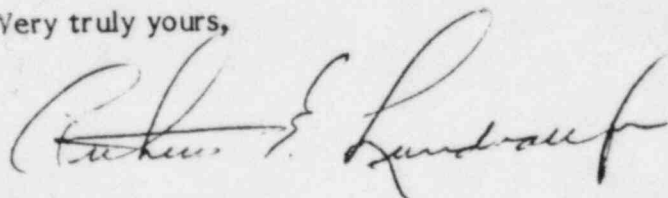
Mr. Thomas T. Martin
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4. All modifications involving changes to the Technical Specifications are verified to have been completed, reviewed, and approved by the NRC.
 5. All changes affecting the Operating Instructions, Operating Procedures, and Training are identified such that appropriate revisions can be made.
- B. Prior to final closeout of the Facility Change Request (FCR) documentation the following actions are taken.
1. All outstanding Maintenance Requests generated against the modification are verified to be complete. These Maintenance Requests typically involve deficiencies, (such as retermination/repair or painting, etc., of equipment) that do not affect the safety-related function of the modified system. In this way, deficiencies requiring maintenance actions are tracked to completion prior to final closeout of the Facility Change Request documentation.
 2. Attachments to CCI-126 identified as checklists for documenting completed actions are verified completed by Responsible Engineers assigned to each FCR. These attachments are used to document, as an example, the following actions: spare part orders, revisions to Functional Test Procedures, Surveillance Test Procedures, Technical Manuals, Calvert Cliffs Instructions, Preventive Maintenance Procedures, Fire Strategy Procedures, the Instrument Index, etc.

We believe that the formal controls currently implemented by CCI-126 provide adequate assurance that important activities involving modifications to safety-related equipment are accomplished. We perceive no benefit in formalizing an administrative mechanism which is used infrequently to track non-significant deficiencies. We, therefore, request that you reconsider the issuance of the subject item of noncompliance.

Should you have further questions regarding this matter, please do not hesitate to contact us.

Very truly yours,



AEL/LOW/gla

Mr. Thomas T. Martin
August 23, 1984
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cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC