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September 20, 1985

ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

Director of Nuclear Reactor Regulation  
Attention: Mr. E. J. Butcher, Jr., Chief  
Operating Reactors Branch #3  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Calvert Cliffs Nuclear Power Plant  
Units Nos. 1 & 2; Dockets Nos. 50-317 and 50-318  
Detailed Control Room Design Review

Gentlemen:

In response to NUREG-0737, Supplement 1, BG&E submitted a Program Plan on September 1, 1983 for conducting a Detailed Control Room Design Review (DCRDR) at Calvert Cliffs. In a letter dated December 30, 1983, and during an in-progress audit conducted from November 27-30, 1984, your staff suggested certain changes to the Program Plan to assure that the program would adequately identify and correct any major Human Engineering Deficiencies (HEDs) in the control room.

The purpose of this letter is to inform you that, after consideration of your suggestions, we are supplementing the Program Plan to include a functional task analysis and a new control room survey. The generic guidance contained in Combustion Engineering report "Generic Information and Control Requirements Review" (CEN-307) will be used to develop a Calvert Cliffs-specific task analysis along with information and control characteristics requirements. A presentation on CEN-307 was given by Combustion Engineering to the NRC Human Factors Branch on July 31, 1985 and the report was formally submitted to the NRC on September 6, 1985. CEN-307 describes the methodology and results of a task analysis which was conducted on the Combustion Engineering Emergency Procedures Guidelines (CEN-152, Rev. 02) in order to identify the operator information and control requirements needed to support operations in accordance with the Emergency Procedure Guidelines for a generic reference plant. The document also provides a method and a software package which supports conversion of the generic document to a plant-specific information and controls requirements document. The BG&E DCRDR team will perform the generic-to-plant-specific conversion and, if necessary, assistance will be solicited from Combustion Engineering. The plant-specific information and control requirements will then be compared with the control room inventory, and HEDs will be written to address discrepancies.

In order to ensure that all of the NUREG-0700 survey criteria are met, a new survey will be performed using the NUREG-0700, Section 6 checklists. This survey will utilize photographs of the control boards and walkdowns on both the plant specific simulator and the control boards. This repeat of the control room survey will allow

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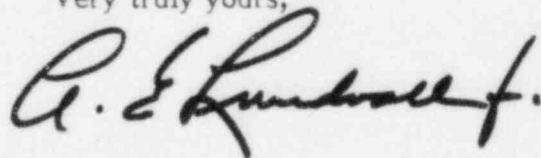
review of additional modifications made since the original survey and, because many HEDs identified in the original survey have already been corrected, significant HEDs will not be masked by less significant ones. All HEDs initiated during the survey and task performance verification phases will be entered into the existing assessment and implementation system.

After all of the HEDs requiring modifications (both existing and newly identified) have been corrected, a verification of the corrections will be performed. This will include both control room and simulator walkdowns to verify that the modifications have corrected the HEDs and that no new HEDs were created.

With the availability of a task analysis, coordination with the other NUREG-0737 programs will be enhanced. The information and control characteristics requirements will be used to verify SPDS parameters, Regulatory Guide 1.97 parameters and the Emergency Operating Procedures.

These tasks are being performed to supplement the existing BG&E DCRDR and are not meant to replace the original review. Because of the extent of this additional work, a supplement to the BG&E Program Plan will be submitted on November 1, 1985. This supplement will detail the scope of the additional review and a schedule for all of the activities. In any case, all of these activities, including the implementation of modifications to correct HEDs, will be completed within the already committed time frame for the DCRDR. The review phases will be completed by June 1, 1987 and all modifications will be completed by the end of the Fall 1989 Unit 1 outage. This will not interface with the present schedule for correction of already identified HEDs.

Very truly yours,



AEL/SWS/BSM/vd

cc: D. A. Brune, Esq.  
G. F. Trowbridge, Esq.  
Mr. D. H. Jaffe, NRC  
Mr. T. Foley, NRC  
Mr. R. R. Mill, CE