

Mr. Charles H. Cruse
 Vice President - Nuclear Energy
 Baltimore Gas and Electric Company
 Calvert Cliffs Nuclear Power Plant
 1650 Calvert Cliffs Parkway
 Lusby, MD 20657-4702

May 14, 1998

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, CHANGES TO THE CALVERT
 CLIFFS NUCLEAR POWER PLANT QUALITY ASSURANCE POLICY
 (TAC NOS. MA1474 AND MA1475)

Dear Mr. Cruse:

By letter dated March 27, 1998, as supplemented April 21, 1998, Baltimore Gas and Electric Company (BGE) proposed changes to the Calvert cliffs Nuclear Power Plant, Units Nos. 1 and 2. Quality Assurance (QAP) Policy. The NRC staff is currently reviewing your request for these changes. Enclosed is a request for additional information which is required in order for the staff to complete its review of your request. The request for additional information also provides our preliminary evaluation of certain QAP changes submitted in accordance with 10 CFR 50.54(a)(3) that were identified as reductions in commitments in your March 27, 1998, letter.

Based on our need for the additional information, we have not determined if these changes are acceptable pursuant to 10 CFR 50.54 (a)(3)(ii) and you should refrain from implementing them until you have been formally notified otherwise. The staff requests that the additional information be provided within 60 days of receipt of this letter.

If you have any questions regarding this matter, please contact me at (301) 415-3473.

Sincerely,

Original Signed by:

Alexander W. Dromerick, Senior Project Manager
 Project Directorate I-1
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Docket Nos. 50-317
 and 50-318

Enclosure: Request for Additional
 Information

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**HCHAB concurrence with comment*

*1/1
 DFOI*

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*HQMB concurrence with comment



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 14, 1998

Mr. Charles H. Cruse
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
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(TAC NOS. MA1474 AND MA1475)

Dear Mr. Cruse:

By letter dated March 27, 1998, as supplemented April 21, 1998, Baltimore Gas and Electric Company (BGE) proposed changes to the Calvert Cliffs Nuclear Power Plant, Units Nos. 1 and 2. Quality Assurance Policy (QAP). The NRC staff is currently reviewing your request for these changes. Enclosed is a request for additional information which is required in order for the staff to complete its review of your request. The request for additional information also provides our preliminary evaluation of certain QAP changes submitted in accordance with 10 CFR 50.54(a)(3) that were identified as reductions in commitments in your March 27, 1998, letter.

Based on our need for the additional information, we have not determined if these changes are acceptable pursuant to 10 CFR 50.54 (a)(3)(ii) and you should refrain from implementing them until you have been formally notified otherwise. The staff requests that the additional information be provided within 60 days of receipt of this letter.

If you have any questions regarding this matter, please contact me at (301) 415-3473.

Sincerely,

A handwritten signature in cursive script that reads "Alexander W. Dromerick".

Alexander W. Dromerick, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-317
and 50-318

Enclosure: Request for Additional
Information

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Mr. Charles H. Cruse
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant

cc:

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King of Prussia, PA 19406

REQUEST FOR ADDITIONAL INFORMATION
BALTIMORE GAS AND ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-317 AND 50-318

By letter dated March 27, 1998, as supplemented April 21, 1998, Baltimore Gas and Electric Company (BGE) submitted proposed changes in accordance with 10 CFR 50.54(a)(3) to Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, Quality Assurance Policy (QAP). The scope of the NRC staff's review of these QAP changes was limited to those changes identified as reductions in commitments in BGE's March 27, 1998, letter.

BGE proposed to add the following to Section 1B.5, "Instructions, Procedures, and Drawings," on Page 25 of Revision 49 to its QAP:

"Editorial corrections to procedures of Technical Specification 6.4 may be made provided the editorial correction is processed according to administrative procedures that include approval by a member of the plant management staff knowledgeable in the areas affected by the procedures."

NRC Comments:

1. The terms "editorial correction" and "minor alterations" as related to procedure changes are not addressed in the QAP. Please define these terms.
2. The BGE March 27, 1998, letter identified correcting a spelling error as a type of an editorial correction covered by the scope of the proposed QAP change. However, it appears from the text of the March 27, 1998, letter that the scope of the change is for minor alterations. Please provide other examples of minor alterations.

Because the proposed change affects TS Section 6.4 procedures, the staff questions the extent of review performed to ensure that the editorial change would not change the intent of the procedure. The BGE QAP provisions for controlling temporary changes to procedures (changes that do not change the intent of the procedures) controlled by TS Section 6.4 require certain reviews and approvals prior to implementation and full review and approval of the changes within 14 days of implementation. Unlike the QAP provisions for Temporary Changes, there appears to be no independent reviews or overchecks to ensure that the editorial change or minor alteration would not change the intent of the procedure.

Please provide additional discussion on the differences between changes made as temporary changes (that do not change the intent of the procedure) and changes that are minor alterations. Should the scope of minor alterations be similar to certain changes controlled as temporary changes, the staff believes that the temporary change controls should apply to such changes.

3. Would editorial changes to procedures for TS Section 6.4 procedures be subjected to some type of independent review such as a limited scope review by a qualified reviewer or the Procedures Review Committee (PRG) (see comment below) to ensure that the intent of the procedure is not changed by the editorial change before being approved? If not, please provide additional discussion and identify the controls that would provide assurance that the editorial change would not change the intent of the procedure.

Enclosure

4. Reference is made to designating certain classes of procedures in writing to be reviewed by the PRG. Would any of the TS Section 6.4 procedures be designated as being subject to review by the PRG? What are the requirements for the individuals in the PRG performing procedure review? Are the qualification requirements the same as those for a qualified reviewer?

5. Because of the safety significance of certain TS Section 6.4 procedures and the fact that certain editorial changes/minor alterations may change the intent of a procedure, the staff believes these administrative controls, as well as additional controls for ensuring that the editorial change does not change the intent of the procedure, need to be addressed in the QAP.