

## Constellation Nuclear

### Calvert Cliffs Nuclear Power Plant

*A Member of the  
Constellation Energy Group*

January 31, 2002

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  
License Amendment Change Request Regarding Missed Surveillance Using the  
Consolidated Line Item Improvement Process

Pursuant to 10 CFR 50.90, the Calvert Cliffs Nuclear Power Plant, Inc. hereby requests an amendment to Renewed Operating License Nos. DPR-53 and DPR-69 to modify Technical Specification Surveillance Requirement 3.0.3 for missed surveillances.

#### **REQUESTED CHANGE**

We propose to change Technical Specification Surveillance Requirement 3.0.3, consistent with Nuclear Regulatory Commission approved Standard Technical Specification change Technical Specification Task Force (TSTF)-358, Revision 5, as modified by Federal Register Notice 66FR32400 (June 14, 2001). In the case of a missed surveillance, this change will allow the surveillance to be performed in 24 hours or the frequency of the surveillance, whichever is greater.

Attachment (1) provides a description of the proposed change, the requested confirmation of applicability and plant specific verification. Attachment (2) provides the existing Technical Specification pages marked-up to show the proposed change.

#### **ENVIRONMENTAL EVALUATION**

We have reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001 as part of the Consolidated Line Item Improvement Process and have determined that the staff's findings presented in that evaluation are applicable to Calvert Cliffs Nuclear Power Plant and the evaluation is hereby incorporated by reference for this application.

#### **SAFETY COMMITTEE REVIEW**

This proposed amendment to the CCNPP Technical Specifications has been reviewed by our Plant Operations and Safety Review Committee and Offsite Safety Review Committee. They have concluded that implementing this amendment will not result in an undue risk to the health and safety of the public.

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**SCHEDULE**

This change is requested to be approved and issued by September 1, 2002. We believe this amendment does not adversely impact plant safety and should be approved.

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

Very truly yours,



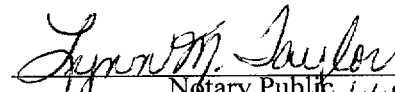
STATE OF MARYLAND :  
: TO WIT:  
COUNTY OF CALVERT :

I, Charles H. Cruse, being duly sworn, state that I am Vice President - Nuclear Energy, Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP), and that I am duly authorized to execute and file this License Amendment Request on behalf of CCNPP. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other CCNPP employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.



Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of CALVERT, this 31<sup>st</sup> day of JANUARY, 2002.

**WITNESS** my Hand and Notarial Seal:

  
Notary Public LYNN M. TAYLOR

My Commission Expires:

2/1/2006  
Date

CHC/EMT/bjd

Attachments: (1) Description and Analysis  
(2) Technical Specifications Marked-Up Page

cc: R. S. Fleishman, Esquire  
J. E. Silberg, Esquire  
Director, Project Directorate I-1, NRC  
D. M. Skay, NRC  
H. J. Miller, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR

**ATTACHMENT (1)**

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**DESCRIPTION AND ANALYSIS**

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**ATTACHMENT (1)**  
**DESCRIPTION AND ANALYSIS**

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**DESCRIPTION**

The proposed amendment would modify Technical Specification requirements for missed surveillances in Surveillance Requirement 3.0.3 to allow the missed surveillance to be performed in 24 hours or the frequency of the surveillance, whichever is greater. The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force Standard Technical Specification change TSTF-358, Revision 5, as modified by Federal Register Notice 66FR32400, of June 14, 2001, and in response to public comments. The availability of this Technical Specification improvement was published in the Federal Register on September 28, 2001 as part of the Consolidated Line Item Improvement Process (CLIIP).

**SAFETY EVALUATION APPLICABILITY**

We have reviewed the safety evaluation dated June 8, 2001 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. We have concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Calvert Cliffs Nuclear Power Plant (CCNPP) Units 1 and 2 and justify this amendment for the incorporation of the changes to the CCNPP Technical Specifications.

**OPTIONAL CHANGES AND VARIATIONS**

This letter does not propose any variations or deviations from the Technical Specification changes described in the fully modified TSTF-358, Revision 5 or the NRC staff's model safety evaluation dated June 8, 2001.

**NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION**

We have reviewed the proposed no significant hazards consideration determination published in the Federal Register as part of the CLIIP. We have concluded that it is applicable to CCNPP and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

**TECHNICAL SPECIFICATION BASES**

The CCNPP Technical Specification Bases currently include a basis for Surveillance Requirement 3.0.3 that states the use of the delay period is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but is only for the performance of missed surveillances. The Calvert Cliffs Technical Specifications contain a Bases Control Program consistent with Section 5.5 of the Standard Technical Specifications.

When this license amendment request is approved, the basis for Surveillance Requirement 3.0.3 will be changed to:

- A. Provide details on how to implement the new requirements.
- B. Provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating conditions or requirements of regulations.
- C. State that the missed surveillance is expected to be performed at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance.

**ATTACHMENT (1)**

**DESCRIPTION AND ANALYSIS**

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- D. State that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance at Nuclear Power Plants."
- E. State that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182.
- F. State that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively.
- G. State that the results of the risk evaluation determine the safest course of action.
- H. State that all missed surveillances will be placed in the CCNPP Corrective Action Program.

**LIST OF REGULATORY COMMITMENTS**

The following table identifies those actions committed to by CCNPP in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Regulatory Commitments	Due Date
Establish the Technical Specification Basis for SR 3.0.3 as adopted with the license amendment	Upon implementation of the amendment

**ATTACHMENT (2)**

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**TECHNICAL SPECIFICATIONS MARKED-UP PAGES**

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**3.0-4**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1      SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO, except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2      The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance, or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3      If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery up to 24 hours, or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the greater Surveillance. *A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.*