

August 8, 2003

Mr. P. E. Katz, Vice President
Calvert Cliffs Nuclear Power Plant, Inc.
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, TECHNICAL SPECIFICATION
CHANGE TO EXTEND THE DIESEL GENERATOR REQUIRED ACTION
COMPLETION TIME FOR CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT
NOS. 1 AND 2 (TAC NOS. MB8976 AND MB8977)

Dear Mr. Katz:

By letter dated May 12, 2003, you submitted a license amendment to incorporate changes into the Technical Specifications for Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2. The proposed changes would extend several Required Action Completion Times for inoperable diesel generators.

The U.S. Nuclear Regulatory Commission staff has reviewed the information provided and determined that additional information is required in order to complete the evaluation. The additional information being requested is enclosed. We have discussed this with your staff who indicated that you could provide a response within 60 days from the date of this letter.

Sincerely,

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosure: As stated

cc w/encl: See next page

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ACCESSION NUMBER: ML031990277

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DATE	7/8/03	7/21/03	8/8/03

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Unit Nos. 1 and 2

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REQUEST FOR ADDITIONAL INFORMATION
FOR CALVERT CLIFFS NUCLEAR POWER PLANT, INC.
TECHNICAL SPECIFICATION AMENDMENT REQUEST
RELATED TO A PROPOSED CHANGE TO EXTEND THE
DIESEL GENERATOR REQUIRED ACTION COMPLETION TIME FOR
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-317 AND 50-318

By letter dated May 12, 2003, the licensee proposed changes to Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 Technical Specifications (TSs) for extending the allowed outage time (AOT) up to 14 days for emergency diesel generators (DGs) to perform a preventive or a corrective maintenance during plant operation. In order for the staff to proceed with its review of the proposed change, the following information is needed:

1. It is the staff's understanding that the purpose of the requested amendment is to allow an increased outage time during plant power operation for performing DG inspection, maintenance, and overhaul, which would include disassembly of the DG. DG operability verification after a major maintenance or overhaul may require a full-load rejection test. If a full-load rejection test is performed at power, please address the following:
 - a. What would be the typical and worst-case voltage transients on the 4160-V safety buses as a result of a full-load rejection?
 - b. If a full-load rejection test is used to test the DG governor after maintenance, what assurance would there be that an unsafe transient condition on the safety bus (i.e., load swing or voltage transient) due to improperly performed maintenance or repair of a governor would not occur?
 - c. Using maintenance and testing experience on the DG, identify possible transient conditions caused by improperly performed maintenance on the DG governor and voltage regulator. Discuss the electrical system response to these transients.
 - d. Provide the tests to be performed after the overhaul to declare the DG operable and provide justification of performing those tests at power.
2. What type of communication has been established between the control room operator of Calvert Cliffs station and the system load dispatcher? Is the system load dispatcher notified in advance that the DG is going to be out for an extended period of time?

Enclosure

3. It is stated that 0C DG can be aligned to any of the four engineered safety feature (ESF) buses and is capable of supplying the same emergency plant loads as the other DGs in the event of a station blackout. In this regard, provide the following information:
 - a. How long does it take to accomplish this connection and can this connection be accomplished from the control room?
 - b. What is the current reliability of 0C DG and how often is it tested?
4. Table 4 of the submittal shows unavailabilities for all DGs. The unavailability of 0C DG is listed to be less than 800 hours as compared to other DGs. What is the basis for setting such a low goal for the 0C DG?
5. Please provide justification for increasing limiting condition for operation (LCO) from 2 hours to 12 hours when 2 DGs are inoperable keeping in mind that it is more critical to lose 1A and 1B than 1A and 2B.
6. It is stated on page 2, second sentence that "the first.....a single inoperable safety-related DG to 14 days, provided that the 0C DG is available and the other three safety-related DGs are operable." However, the proposed Action B1 requires verification that both DGs on the other unit operable and 0C DG available. Please remove the cited discrepancy. Please note that Action C may also have to be revised, if applicable.
7. Other licensees who requested DG AOT extension provided the following Regulatory Commitments in their requests:
 - a. Weather conditions will be evaluated prior to entering the extended DG AOT for voluntary planned maintenance. An extended DG AOT will not be entered for voluntary planned maintenance purposes if official weather forecasts are predicting severe conditions (tornado or thunderstorm warnings).
 - b. The condition of the offsite power supply and switchyard will be evaluated prior to entering the extended AOT.
 - c. No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary or startup transformers associated with the unit.
 - d. No maintenance or testing that affects the reliability of the train associated with the OPERABLE DG will be scheduled during the extended AOT. If any testing and maintenance activities must be performed while the extended AOT is in effect, a 10 CFR 50.65(a)(4) evaluation will be performed.
 - e. The personnel will be notified to ensure no elective maintenance will be scheduled on the alternate ac source and will be made aware of the dedication of the alternate ac source to the affected unit.

- f. The steam driven emergency feedwater pump will not be taken out of service for planned maintenance activities and will be treated as protected equipment.
- g. The system dispatcher will be contacted once per day and informed of the EDG status along with the power needs of the facility.
- h. Should a tornado or thunderstorm warning be issued for the local area, an operator will be available should local operation of the alternate ac source be required as a result of on-site weather-related damage.
- i. The on-shift Operations crews will discuss and review appropriate normal and emergency operating procedures upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.
- j. The Operations crews will be briefed concerning the unit activities, including compensatory measures established and the importance of promptly starting and aligning the alternate ac source following instruction of the shift manager upon the loss of power event. This briefing will be performed upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.

Please provide the provisions, limitations and compensatory actions that you will be implementing, to assure adequate defense-in-depth during the extended DG AOT.

- 9. The proposed change to 3.8.1.c Required Action D.4 from 72 hours to 21 days is not clear to the staff. The current 72-hour Completion Time of the LCO was based on the fact that the DG Completion Time for an inoperable DG LCO is currently 72 hours. Since the proposed request is to increase LCO of one inoperable DG from the current 72 hours to 14 days, the Completion Time for Required Action D.4 should correspondingly be 14 days not 21 days. Please explain.