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December 5, 2003

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 Request: Change to the Testing Requirements for
Containment Spray Nozzles; Response to Request for Additional Information

REFERENCES:

- (a) Letter from Mr. G. S. Vissing (NRC) to Mr. G. Vanderheyden (CCNPP), dated November 5, 2003, "Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 - Request for Additional Information Related to the Changing of Test Requirements for Containment Spray Nozzles (TAC Nos. MC0030 and MC0031)"
- (b) Letter from Mr. G. Vanderheyden (CCNPP) to Document Control Desk (NRC), dated July 14, 2003, "License Amendment Request: Change to the Testing Requirements for Containment Spray Nozzles"
- (c) Letter from Mr. A. W. Dromerick (NRC) to Mr. C. H. Cruse (CCNPP), dated May 4, 1998, "Issuance of Amendments for Calvert Cliffs Nuclear Power Plant Unit No. 1 (TAC No. M97363) and Unit No. 2 (TAC No. M97364)"

This letter is in response to Reference (a) in which the Nuclear Regulatory Commission (NRC) asked for clarifying information related to a Calvert Cliffs' license amendment request (Reference b). This information does not affect the No Significant Hazards Considerations Determination or the Environmental Impact Statement of Reference (b).

Question 1:

Please explain the differences in license requirements and burden on the licensee if the surveillance requirement Technical Specification 3.6.6.8 is changed to the words "following maintenance that could result in nozzle blockage" rather than deleting the surveillance requirement altogether and depending on the post-maintenance testing.

A001

Response:

As noted in Reference (a), the NRC has approved license changes for several plants to require testing of containment nozzles after maintenance that could result in nozzle blockage instead of every ten years. The result of this change is that the surveillance requirement has become post-maintenance testing for these plants. While having a post-maintenance test in Technical Specifications would not be a major burden, the requirement would be vague and there would be no performance standard for it.

In the Calvert Cliffs Technical Specifications, Limiting Condition for Operation (LCO) 3.0.1 requires that LCOs be met during the modes or other specified conditions in the LCO applicability. For the Containment Spray System, LCO 3.6.6 requires that the system is operable in Modes 1 and 2 and in Mode 3 except when the pressurizer pressure is less than 1750 psia. The basis for Surveillance Requirement (SR) 3.0.1 states, "Upon completion of maintenance, appropriate post-maintenance testing is required to declare equipment operable." This requirement in the Technical Specification Bases negates the need for specific surveillance requirements that are post-maintenance tests.

Calvert Cliffs has converted from the Standard Technical Specifications to the Improved Standard Technical Specifications (ISTS). When the ISTS were developed, all post-maintenance surveillance requirements were intentionally deleted because the requirement to verify that the equipment is operable, and that the LCO is met, is contained in ISTS SR 3.0.1. An example of this philosophy is the deletion of SR 4.6.4.1.1 in the Calvert Cliffs' conversion to ISTS. This surveillance requirement was a specific post-maintenance test requirement whose deletion was approved on the basis that post-maintenance tests were not appropriate as surveillance requirements (Reference c).

Therefore, the license amendments that have been issued to revise the surveillance frequency are inconsistent with the philosophy of the content of the ISTS and other specifications in the ISTS. Since a specific requirement to test the nozzles after maintenance is, in fact, a post-maintenance test, putting such a requirement in LCO 3.6.6 would be redundant to SR 3.0.1.

Post-maintenance tests are a procedural requirement at Calvert Cliffs. Therefore, from a practical standpoint, having a post-maintenance test in a Technical Specification surveillance requirement is not a significant burden. However, as noted above, the general requirement to perform post-maintenance testing is already stated in Technical Specifications and repeating it in this surveillance does not conform to the philosophy of the ISTS.

Our requested license amendment conforms to the industry position expressed in TSTF-452-T. Reference (b) describes how Calvert Cliffs meets the four conditions in the reviewer's note proposed by TSTF-452-T.

Question 2:

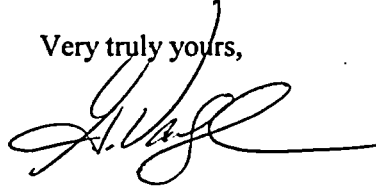
Since the previous flow tests, have there been any condition reports that would have affected flow through the containment spray system nozzles and headers?

Response:

We have not had any condition reports on incidents that would have affected nozzle flow since the last flow tests.

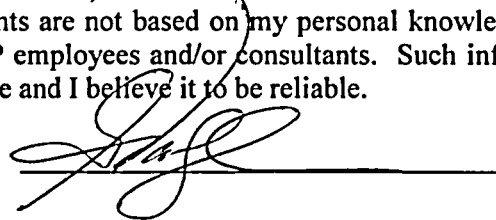
Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

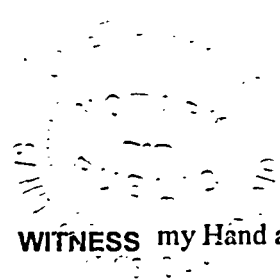


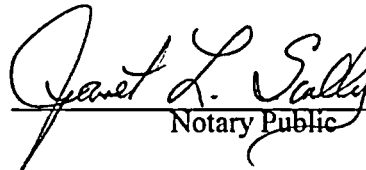
STATE OF MARYLAND :
: TO WIT:
COUNTY OF CALVERT :

I, George Vanderheyden, being duly sworn, state that I am Vice President - 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 St. Mary's, this 5th day of December, 2003.


WITNESS my Hand and Notarial Seal:


Notary Public

My Commission Expires:

March 25 2007
Date

GV/EMT/bjd

cc: J. Petro, Esquire
J. E. Silberg, Esquire
Director, Project Directorate I-1, NRC
G. S. Vissing, NRC

H. J. Miller, NRC
Resident Inspector, NRC
R. I. McLean, DNR