

BALTIMORE GAS AND ELECTRIC COMPANY

GAS AND ELECTRIC BUILDING
BALTIMORE, MARYLAND 21203

July 24, 1979

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Calvert Cliffs Nuclear Power Plant
Units Nos. 1 & 2; Dockets Nos. 50-317 & 50-318
Request for Amendment to Operating Licenses

Reference: BG&E letter dated 3/15/79 from Lundvall to Denton,
10 CFR Part 50 Appendix I, forwarding proposed
Technical Specifications (draft).

Dear Mr. Denton:

Baltimore Gas and Electric Company hereby requests an amendment to Operating Licenses DPR-53 and DPR-69 for Calvert Cliffs Units 1 and 2, respectively, with the submittal of the following proposed changes to the Technical Specifications. All changes apply to both Units unless otherwise indicated.

TECHNICAL SPECIFICATION CHANGES

Change No. 1.

(FCR 79-12) Paragraph 4.7.8.1.a: Change the footnote on page 3/4 7-26 as shown on the attached sheets to allow a deferral of the next required visual inspection for the inaccessible hydraulic snubber group until the commencement of the autumn refueling outage, currently scheduled to start October 14, 1979. This deferral will delay the inspection by approximately five weeks as this snubber group is currently on the six month inspection interval with the inspection required to be performed not later than September 10, 1979.

Discussion

U-2 inaccessible snubbers are currently on the six month \pm 25% inspection interval. The next inspection is currently required by September 10, 1979.

Normally, to minimize personnel radiation exposure and because the temperature inside of the pressurizer enclosure is so high during operation, the snubber inspection must be performed with the unit in cold shutdown. The next scheduled cold shutdown for U-2 is the refueling outage

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currently scheduled to commence about October 1979. Therefore, to accomplish this inspection as required, an unplanned shutdown estimated to be 24-36 hours in duration would be necessary. This does not include the time required to cool down and heat up. A temporary relief from paragraph 4.7.8.1.a to allow the visual inspection of these snubbers to be performed during the upcoming outage would be justified based on replacement energy costs and personnel exposure as discussed in the following comparison of alternatives: Alternative (1) Comply with the Technical Specification and shutdown at the six month interval and inspect all inaccessible snubbers, Alternative (2) Perform the inspection of all inaccessible snubbers with the plant operating, Alternative (3) Relax Technical Specification 4.7.8.1.a as described above. An analysis of each alternative is as follows:

- (1) This course of action fully complies with the Technical Specification. However, a presently unscheduled outage would be required before September 10, 1979. The total cost in terms of replacement energy would be approximately \$500,000. This assumes the outage lasts the minimum estimated duration, 24 hours. A more realistic estimate is 36 hours (and, once again, this does not include cooldown/heatup time). This would result in a 50% increase in replacement energy costs. Compliance with the requirements of the Technical Specifications in this manner, since it would only result in approximately a five-week-sooner inspection date, would not appreciably enhance the overall safety of the plant. In addition, all snubbers were found to have been operable during the most recent inspection, completed in January 1979.
- (2) This course of action would also comply with the Technical Specifications, however, the inaccessible snubbers would be inspected during plant operation. The cost in terms of radiation exposure would be prohibitive. To perform an inspection of all 176 snubbers would require approximately 40 manhours and result in excess of 300 manRem.
- (3) This course of action, which is proposed, would provide continued adequate assurance of the public health and safety with no unnecessary increase in power production costs or personnel radiation exposure.

Change No. 2.

(FCR 79-23) Unit No. 2 only, Paragraph 3.8.2.1: Change the operable A.C. electrical bus designations as shown on the attached page.

Discussion

This change is administrative and is necessary to correct an incorrect bus designation. As currently stated, the Technical Specifications would allow the simultaneous de-energizing of redundant busses. The Unit No. 1 Technical Specifications have the correct designations.

Change No. 3.

(FCR 79-28): Paragraph 4.6.2.1.c: Change the inspection interval for the spray system nozzles from five years to ten years as shown on the attached sheet.

Discussion

A nozzle flow test on the containment spray ring is required every five (5) years by technical specifications. Section XI of the current edition of the ASME Boiler and Pressure Vessel Code which is applicable for Calvert Cliffs, (1974 edition through Summer 1975 addenda) exempts the open-ended portions of non-closed systems from any hydrostatic testing and does not substitute any other testing requirement for these systems (para. 1WC-5220).

Section XI of the 1977 edition through Summer 1978 addenda of the ASME B & PV code has been reviewed and found acceptable by the NRC. The comment period required by law before incorporation of this edition has expired. No comments were received by the NRC, therefore, this document will be made law within two months. Section XI of this edition of the code states that a nozzle flow test be performed once per inspection period (10 years) (para 1WC-5222).

Therefore, this technical specification change would change the interval in which we perform the spray ring nozzle flow test to fall in line with the current views of the NRC and ASME code committee. This change would eliminate the performance of four (4) of these tests per unit over the lifetime of the plant saving several thousands of dollars and hundreds of man-hours required for its performance.

Change No. 1

(FCR 79-46): Incorporate the proposed 10 CFR 50 Appendix I Technical Specifications into the Operation Licenses. These technical specifications were previously submitted in a letter dated March 15, 1979 and are hereby included by reference to that submittal (see referenced letter).

Discussion

The proposed Appendix I Technical Specifications were previously forwarded to NRC by cover letter dated March 15, 1979 (See Reference). At that time, since the package had not been formally reviewed by our Safety Committees, we did not submit it in the form of a license amendment request. The package has now been reviewed, and we hereby formally submit it by reference (unchanged) for a license amendment.

Change No. 5.

(FCR 79-49): Change paragraphs 6.2 and 6.5 as shown on the attached pages to reflect the institution of the new Production Maintenance Department (Effective July 1, 1979). This change involves both organization chart changes and Off-Site Safety and Review Committee (OSSRC) membership changes.

Discussion

The Production Maintenance Department is a new Department within the Supply Division which has taken over most of the plant maintenance functions for Calvert Cliffs. As a result, there have been necessary changes in the Company and Plant organization charts to reflect the modified administrative channels. In addition, since some of the expertise which was previously contained within the Electric Production Department, and which constituted part of the OSSRC, is now in the Production Maintenance Department, it is necessary to reflect those changes in the appropriate sections of the Technical Specifications of both Units. These changes are considered to be strictly administrative in nature and have no impact on overall plant safety or the health and safety of the public.

Change No. 6.

(FCR 79-1027): Change Appendix B (Environmental) Technical Specification paragraphs 3.1.2.a and 3.1.2.c to delete the requirements for aquatic chemistry, productivity, plankton, and ATP entrainment studies as shown on the attached sheets.

Discussion

Baltimore Gas and Electric Company began conducting aquatic ecological studies in the region of the Chesapeake Bay near the Calvert Cliffs Nuclear Power Plant site as early as 1968. These studies were designed to yield baseline data by which the effects of the operation of the plant could be judged and to provide information to guide future studies in this area. When Calvert Cliffs Unit 1 received its operating license in 1974, many of these studies were incorporated into the Environmental Technical Specifications (ETS). The purpose of these studies was to investigate and determine the effects, if any, of the plant circulating water discharge on certain water quality parameters as well as the planktonic, nektonic and benthic communities in the vicinity of the plant. Additional studies concerning the effects of plant operation on aquatic organisms pumped through the condenser cooling water system were also required by the ETS. When Unit 2 received its operating license in 1976, a similar set of specifications was written and eventually the two ETS were combined in 1977.

Since unit 1 began operating, the Company has been submitting periodic reports analyzing the results of these studies. The latest report (Reference 1) was designed to analyze all of the data collected since Unit 1 began operating and, as such, assesses the effects of approximately two years of operation of Unit 1 (1975, 1976) and two years of operation of

both Units (1977, 1978). Analysis of data collected during the aquatic chemistry, primary productivity and phytoplankton taxonomy studies did not reveal any significant plant-induced impacts. Some parameter variations, although not of sufficient magnitude to be statistically significant, were noted within the discharge plume itself. However, even these observations were not notable after the plume became diluted with receiving waters. Determination of the effect of passage through the condenser cooling water system upon the survival of phytoplankton (as measured by ATP per ETS 3.1.2.c) was made for Unit 1 (1975, 1976) and Unit 2 (1977, 1978). Over this period half the studies, conducted each year between June and September, resulted in statistically significant decreases of ATP concentrations between the intake and discharge. These decreases ranged from 8 to 43 percent with an average of 23 percent. The effect of passage through the Unit 2 was similar to that found in Unit 1.

As a result of these analyses the Company believes that the purpose of these studies as defined by the ETS has been fulfilled. Because of the short generation times of the phytoplankton population it is expected that any major changes in productivity or taxonomy which might have occurred as a result of plant operation would have been detected by this time. Water chemistry parameters were studied mainly to provide supplementary information. ATP entrainment studies have documented the effects of plant passage on this parameter, and little additional information would be obtained by continuing this study. In addition, the water Resource Administration of the State of Maryland has approved a study plan (Reference 2) to determine compliance with Water Quality Criteria which does not require investigation into any of the areas discussed in this letter. NRC acceptance of this plan has also been obtained (Reference 3).

References

1. Non-Radiological Environmental Monitoring Report, Calvert Cliffs Nuclear Power Plant, January-December 1978. Baltimore Gas and Electric Company and Academy of Natural Sciences of Philadelphia, March 1979.
2. Letter to Mr. A. E. Lundvall, Jr., BG&E from Mr. H. M. Sachs, Department of Natural Resources, State of Maryland. January 16, 1979.
3. Letter to Mr. A. E. Lundvall, Jr., BG&E from Mr. R. W. Reid, NRC February 23, 1979.

SAFETY AND ENVIRONMENTAL REVIEW

All of the above proposed changes have been reviewed by our Plant Operations and Safety Review Committee and Off-Site Safety and Review Committee, and they have concluded that granting of the proposed changes will not result in an undue risk to the health and safety of the public or result in an unacceptable environmental consequence.

SCHEDULE

Please note that Change No. 1 will require prompt NRC action since the current inspection due date is September 10, 1979. We request

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this change by August 24, 1979. In addition, the changes involving the new Production Maintenance Department (Change No. 5) are already in effect from an organizational standpoint. Consequently, your prompt review and approval of this change will serve to minimize the time that the Technical Specifications do not accurately reflect our actual organization. Since the studies addressed in Change No. 6 are currently required each summer, your approval of this request would preclude the need to conduct some of those studies this year depending on when the approval is received.

If you have any questions concerning any of the above change requests, please do not hesitate to contact us.

FEE DETERMINATION

We have determined, pursuant to 10 CFR Part 170 paragraph 170.22, that this amendment request consists of Class IV and Class I amendments for Calvert Cliffs Units 1 and 2, respectively, and, accordingly, we are enclosing BG&E Check No. B087372 in the amount of \$12,700.00 to cover the fee for this request.

BALTIMORE GAS AND ELECTRIC COMPANY

By: 

Vice President
Supply

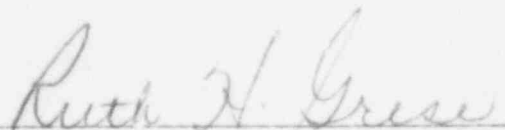
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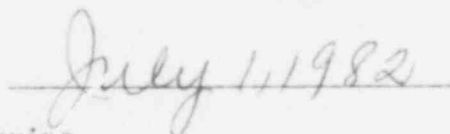
CITY OF BALTIMORE

Mr. A. E. Lundvall, Jr. being duly sworn states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he executed the foregoing Amendment for the purposes therein set forth; that the statements made in said Amendment are true and correct to the best of his knowledge, information and belief; and that he was authorized to execute the Amendment on behalf of said corporation.

WITNESS my hand and Notarial Seal.



My Commission expires:



cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Mr. E. L. Conner, Jr. - NRC
Mr. P. W. Kruse - CE
Mr. J. W. Brothers - Bechtel

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BALTIMORE GAS AND ELECTRIC COMPANY

Fee for operating license amendment
requests for Calvert Cliffs Units 1
and 2 for various technical specification
changes.

\$12,700.00

TOTALS

7/2/79

DETACH THIS PORTION BEFORE DEPOSITING CHECK

BALTIMORE GAS AND ELECTRIC COMPANY

BALTIMORE, MD. 21203

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EXACTLY **12,700** DOLLARS 00 CENTS \$12,700.00

PAY
TO THE U. S. NUCLEAR REGULATORY COMMISSION**
ORDER OF Washington, D. C. 20555

MARYLAND
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PLANT SYSTEMS

3/4.7.8 HYDRAULIC SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.8.1 All hydraulic snubbers listed in Table 3.7-4 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more hydraulic snubbers inoperable, replace or restore the inoperable snubber(s) to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.8.1 Hydraulic snubbers shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

- a. *Each hydraulic snubber with seal material fabricated from ethylene propylene or other materials demonstrated compatible with the operating environment and approved as such by the NRC, shall be determined OPERABLE at least once after not less than 4 months but within 6 months of initial criticality and in accordance with the inspection schedule of Table 4.7-4 thereafter, by a visual inspection of the snubber. Visual inspections of the snubbers shall include, but are not necessarily limited to, inspection of the hydraulic fluid reservoirs, fluid connections, and linkage connections to the piping and anchors. Initiation of the Table 4.7-4 inspection schedule shall be made assuming the unit was previously at the 6 month inspection interval.
- b. Each hydraulic snubber with seal material not fabricated from ethylene propylene or other materials demonstrated compatible with the operating environment shall be determined OPERABLE at least once per 31 days by a visual inspection of the snubber. Visual inspections of the snubbers shall include, but are not necessarily limited to, inspection of the hydraulic fluid reservoirs, fluid connections, and linkage connections to the piping and anchors.

*See page 3/4 7-26.

PLANT SYSTEMSSURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months during shutdown, a representative sample of at least 10 hydraulic snubbers or at least 10% of all snubbers listed in Table 3.7-4, whichever is less, shall be selected and functionally tested to verify correct piston movement, lock up and bleed. Snubbers greater than 50,000 lb. capacity may be excluded from functional testing requirements. Snubbers selected for functional testing shall be selected on a rotating basis. Snubbers identified as either "Especially Difficult to Remove" or in "High Radiation Zones" may be exempted from functional testing provided these snubbers were demonstrated OPERABLE during previous functional tests. Snubbers found inoperable during functional testing shall be restored to OPERABLE status prior to resuming operation. For each snubber found inoperable during these functional tests, an additional minimum of 10% of all snubbers or 10 snubbers, whichever is less, shall also be functionally tested until no more failures are found or all snubbers have been functionally tested.

* The next visual inspection of snubbers designated "Inaccessible" in Table 3.7-4 shall be performed as required by Table 4.7-4 or during the fall 1979 refueling outage.

ELECTRICAL POWER SYSTEMS

3/4.8.2 ONSITE POWER DISTRIBUTION SYSTEMS

A.C. DISTRIBUTION - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.2.1 The following A.C. electrical busses shall be OPERABLE and energized from sources of power other than the diesel generators with tie breakers open between redundant busses:

4160	volt Emergency Bus # 21
4160	volt Emergency Bus # 24
480	volt Emergency Bus # 21A or 21B ^{24B}
480	volt Emergency Bus # 24A or 24B ^{21B}
120	volt A.C. Vital Bus # 21
120	volt A.C. Vital Bus # 22
120	volt A.C. Vital Bus # 23
120	volt A.C. Vital Bus # 24

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With less than the above complement of A.C. busses OPERABLE, restore the inoperable bus to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.2.1 The specified A.C. busses shall be determined OPERABLE and energized from A.C. sources other than the diesel generators with tie breakers open between redundant busses at least once per 7 days by verifying correct breaker alignment and indicated power availability.

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CONTAINMENT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

4.6.2.1 *Each containment spray system shall be demonstrated OPERABLE:*

- b. At least once per 18 months, during shutdown, by:
 - 1. Verifying that each automatic valve in the flow path actuates to its correct position on Safety Injection Actuation test signal.
 - 2. Verifying that each spray pump starts automatically on a Containment Spray Actuation test signal.
- c. At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed. ||

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.6.2.1 Each containment spray system shall be demonstrated OPERABLE:

- b. At least once per 18 months, during shutdown, by:
 - 1. Verifying that each automatic valve in the flow path actuates to its correct position on Safety Injection Actuation test signal.
 - 2. Verifying that each spray pump starts automatically on a Containment Spray Actuation test signal.
- c. At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed. ||

Change No. 5 (FCR - 9-49)

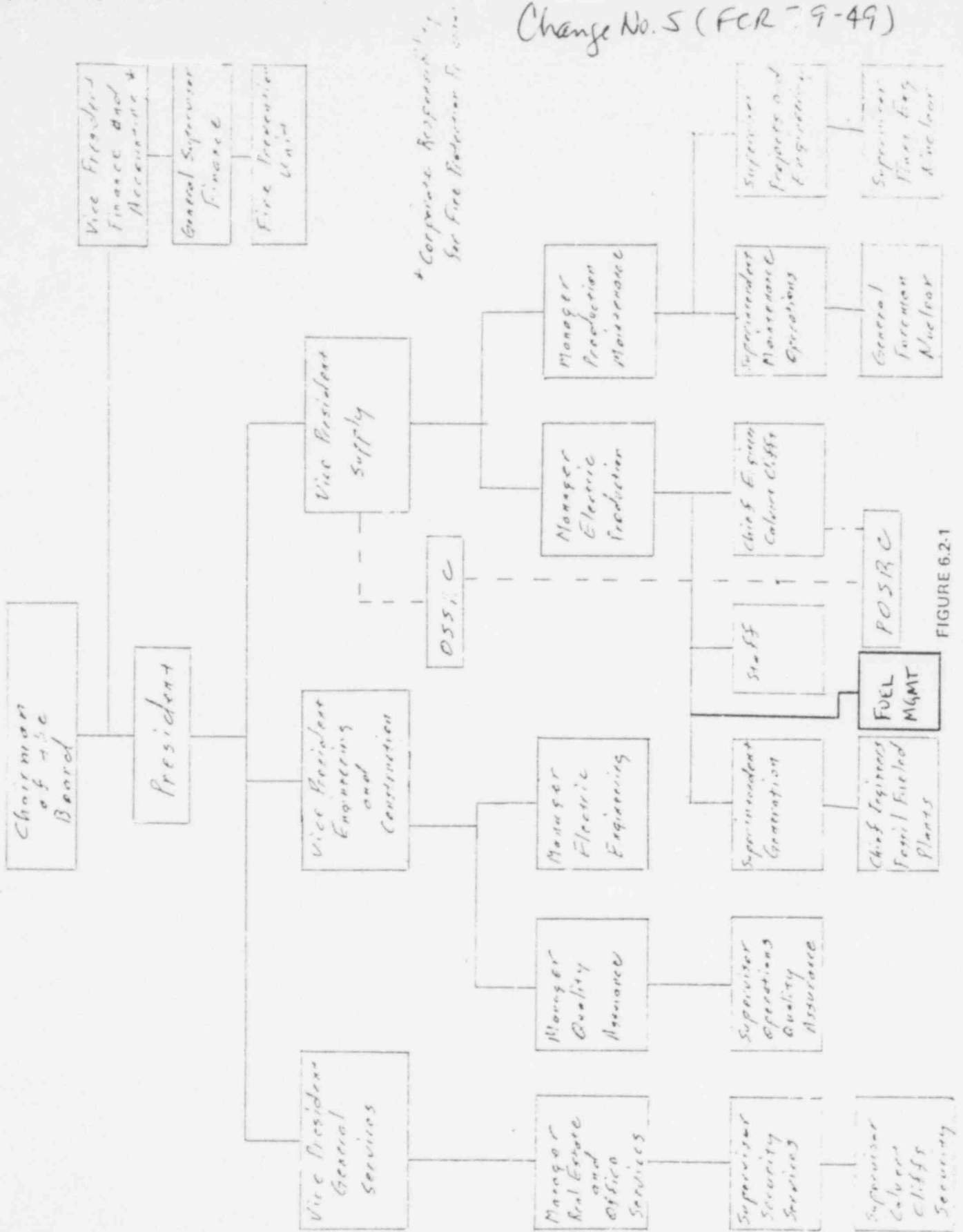
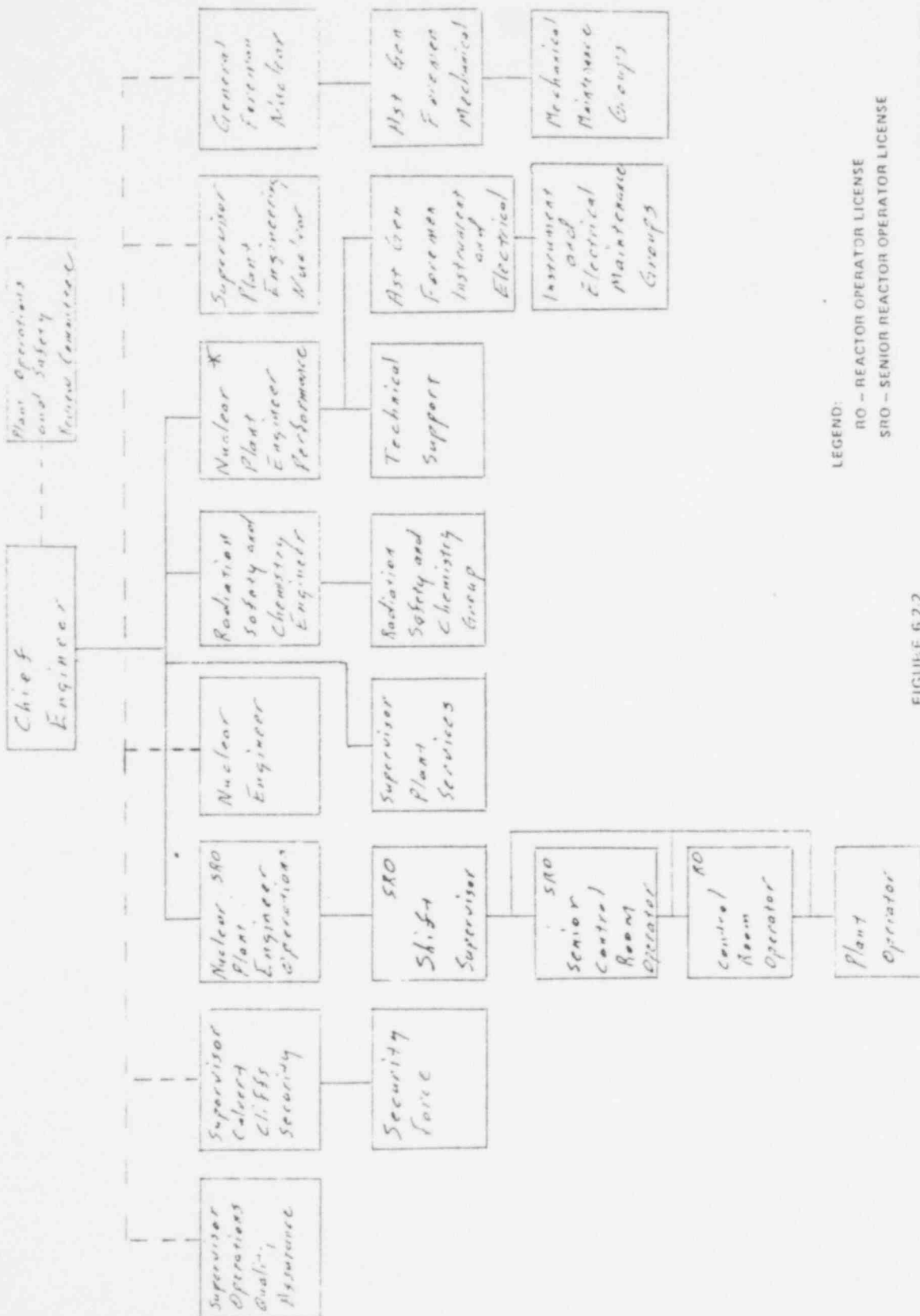


FIGURE 6.2.1

Management Organization Chart
Calvert Cliffs Nuclear Power Plant



LEGEND:
 RO - REACTOR OPERATOR LICENSE
 SRO - SENIOR REACTOR OPERATOR LICENSE
 *ON-SITE RESPONSIBILITY FOR FIRE PROTECTION PROGRAM

FIGURE 6.2.2

Organization Chart (Two Unit Operation)
 Calvert Cliffs Nuclear Power Plant
 Baltimore Gas & Electric Company

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Safety and Chemistry Engineer who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direct supervision of the Chief Engineer and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Chief Engineer and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS AND SAFETY REVIEW COMMITTEE (POSRC)

FUNCTION

6.5.1.1 The POSRC shall function to advise the Chief Engineer on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The POSRC shall be composed of the:

Chairman:	Chief Engineer
Member:	Nuclear Plant Engineer - Operations
Member:	Nuclear Plant Engineer - Maintenance Performance
Member:	Nuclear Engineer
Member:	Radiation Safety and Chemistry Engineer
Member:	Supervisor - Technical Support Plant Engineering Nuclear
Member:	Performance Engineer
Member:	General Foreman

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the POSRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in POSRC activities at any one time.

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.2 The OSSRC shall be composed of the:

Chairman:	Manager, Quality Assurance Department
Member:	Manager, Electric Production Department (EPD)
Member:	Superintendent - Generation, EPD
Member:	Chief Maintenance Engineer, EPD
Member:	Supervising Engineer - Performance, EPD
Member:	General Supervisor - Plant Installation, EPD
Member:	Principal Chemist, EPD
Member:	Principal Metallurgist, EPD PMD
Member:	Chief Engineer, Calvert Cliffs
Member:	Nuclear Engineer, Calvert Cliffs
Member:	Manager, Electric Engineering Department (EED)
Member:	Chief Nuclear Engineer, EED
Member:	Chief Environmental Engineer, EED
Member:	Manager, Production Maintenance Department (PMD)
Member:	Superintendent, Maintenance and Modifications (PMD)

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the OSSRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in OSSRC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the OSSRC Chairman to provide expert advice to the OSSRC.

MEETING FREQUENCY

6.5.2.5 The OSSRC shall meet at least once per ~~calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.~~

QUORUM

6.5.2.6 A quorum of OSSRC shall ⁽⁷⁾ consist of the Chairman or his designated alternate and at least 7 OSSRC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

Change No. 6 (FOR 79-1027)

3.1.2 Biotic

3.1.2.a General Aquatic Ecological Surveys

Objective

The purpose of the general aquatic ecological surveys ^{was} ~~is~~ to investigate and determine the effects, if any, of the plant circulating water discharge on (1) certain physical and chemical parameters indicative of aquatic ecological conditions in the vicinity of the plant and (2) the planktonic, nektonic, and

benthic communities in the vicinity of the plant. The aquatic chemistry, productivity, and plankton studies have been completed, and the results Specifications documented*. Therefore, effective (date) those studies are no longer required, as indicated by the following deletions.

~~3.1.2.a(1) Aquatic Chemistry~~

~~Table 3.1.2.1-1 lists the collection locations and depths as well as the analyses to be performed on water samples which shall be collected once each calendar month.~~

~~3.1.2.a(2) Productivity Studies~~

~~Productivity determinations, using a light-dark bottle oxygen production technique, will be made at three stations (KB, PS, and CP) four times a year - April, June, September, and December.~~

~~3.1.2.a(3) Plankton Studies~~

~~Plankton samples will be collected once each calendar month from surface and bottom at stations KB, PS, and RP. The samples will be identified according to the lowest positive taxonomic group with determinations made of dominant species or genus, relative abundance, and diversity index. A biomass determination shall be made on surface and bottom samples.~~

3.1.2.a (4) Fish Surveys

Fish trawls shall be made once each calendar month at stations KB, PS, and RP. All fish collected will be separated according to species, counted and measured to the nearest $\frac{1}{2}$ centimeter of total length. If more than 100 of any species are present, an estimate of total numbers shall be made and a random sample of 100 of that species shall be measured.

* Non-Radiological Environmental Monitoring Report, Calvert Cliffs Nuclear Power Plant, Jan-Dec 1978. Baltimore Gas & Electric Company and Academy of Natural Sciences of Philadelphia, March 1979.

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Objective

The purpose of this specification is to determine the effect of passage through the condenser cooling water system upon the survival of entrained plankton.

Specification

1. These studies shall be conducted during the months of June, July, August and September. This program may be modified or terminated with the approval of the NRC.
2. Once during each of the above months adenosine triphosphate (ATP) measurements shall be made on filtered water samples collected at the Unit 2 intake, discharge and at one point in the plume. Quantitative samples shall also be taken at the intake and discharge to determine the kinds, quantity, and survival of entrained zooplankton. Methods used for both the ATP and zooplankton measurements will be essentially the same as those described in the Semi-Annual Environmental Monitoring Reports dated September 1975 and March 1976.
3. Monthly ichthyoplankton tows shall be made at the Plant Site and Kenwood Beach Stations identified in Figure 3.1.2.a-1.

Basis

More than one year of entrainment data for Calvert Cliffs Unit 1 has been collected at this time. Since there is no reason to expect different effects of entrainment on aquatic organisms pumped through Unit 2 rather than through Unit 1 a modified version of the Unit 1 entrainment study will be conducted. These studies will be conducted during the warm summer months when the largest effect on entrained organisms is expected. Ichthyoplankton studies during the first year of operation of Unit 1 have shown very low densities of eggs and larvae in the vicinity of Calvert Cliffs. For this reason, ichthyoplankton entrainment studies will not be conducted for the Calvert Cliffs site.