

BALTIMORE GAS AND ELECTRIC COMPANY

GAS AND ELECTRIC BUILDING
BALTIMORE, MARYLAND 21203

October 5, 1979

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Mr. Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Subject: Calvert Cliffs Nuclear Power Plant
Units Nos. 1 & 2, Docket Nos. 50-317 & 50-318
Secondary Water Chemistry

Reference: NRC letter dated 7/23/79 from R. W. Reid
to A. E. Lundvall, Jr., same subject.

Gentlemen:

The referenced letter informed us that the prevention of steam generator tube degradation through the implementation of a chemistry control and surveillance program enforced by the technical specifications may be accomplished through a more efficient method, the use of a license condition. The letter also requested that we submit an application with fee for a license amendment to include the proposed license condition. The license condition would then invoke a specific chemistry control and surveillance program, including procedures.

We have discussed the proposed amendment, both within our Company and with your Staff, especially as concerns the potential benefits of the change set against the cost of requesting and implementing the change, and have determined that it is not fully justifiable at this time. We base this determination on the following:

1. The Calvert Cliffs chemistry program has been in effect since initial fill of the systems involved and is well-documented in plant procedures. Specific parameters have been subject to Technical Specifications since the implementation of the Standard Technical Specifications on February 11, 1977. This arrangement has provided continuous assurance of a well-maintained chemistry program. As you may recall, Baltimore Gas and Electric Company was one of the first companies to cooperate with NRC in the development of the Standardized secondary chemistry technical specifications.
2. Our inservice inspection program has shown that the Calvert Cliffs steam generator tubes have exhibited a high degree of corrosion resistance. This can be directly attributed to the careful implementation of the chemistry control program.

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3. The submittal of the proposed application would require the simultaneous submittal of the appropriate fee (\$4,400) unless it is determined that our previous early request for secondary chemistry technical specifications, submitted on December 20, 1976, qualifies us for exemption of the fee. We feel that this fee, coupled with the manpower required to implement a modified chemistry program, if necessary, is in excess of the benefits to be gained in the case of Calvert Cliffs.
4. Even if the present chemistry program is considered acceptable such that no changes are required, we feel that the fee is in excess of the potential benefits.

Therefore, we propose to submit the requested application combined with several other technical specification changes, which we are currently developing, so as to make use of the provision which allows the submittal of a blanket fee to cover three or more changes.

We would be pleased to discuss this matter with you and request that a meeting be scheduled between the appropriate members of our Staffs if you feel that better clarification of your intended program is required.

Very truly yours,



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

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