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GEORGE C. CREEL  
VICE PRESIDENT  
NUCLEAR ENERGY  
(301) 260-4455

January 12, 1990

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  
Supplement to a Previously Submitted Request For Amendment

REFERENCE: (a) Letter to Document Control Desk (NRC) from Mr. G. C. Creel  
(BG&E), dated August 30, 1989, Request For Amendment

Gentlemen:

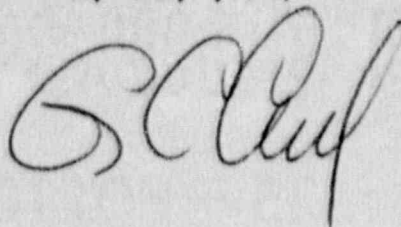
Reference (a) was a request for amendment proposing four changes to Technical Specifications addressing five Heating and Air Conditioning (HVAC) type systems. We have received feedback from our NRR Project Manager that the Analysis of Significant Hazards Considerations for Changes 1 and 2 lacks sufficient detail. Enclosure (1) to this letter provides an Analysis of Significant Hazards Considerations that repeats and supplements the section titled DETERMINATION OF SIGNIFICANT HAZARDS in Reference (a). We request that this be included as part of that previously submitted Request For Amendment.

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

Very truly yours,



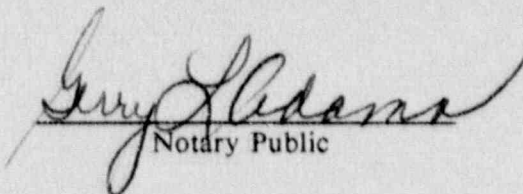
STATE OF MARYLAND

County of Calvert

TO WIT:

I hereby certify that on the 12th day of January, 1990 before me, the subscriber, a Notary Public of the State of Maryland in and for St. Mary's County, personally appeared George C. Creel, being duly sworn, and states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements made are true and correct to the best of his knowledge, information, and belief; and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:

  
Notary Public

My Commission Expires:

1 July 1990  
Date

GCC/DLS/bjd

Enclosure

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
R. A. Capra, NRC  
S. A. McNeil, NRC  
W. T. Russell, NRC  
J. E. Beall, NRC  
T. Magette, DNR

## ENCLOSURE (1)

### **SUPPLEMENT TO A PREVIOUSLY SUBMITTED REQUEST FOR A MENDMENT**

#### ANALYSIS OF SIGNIFICANT HAZARDS CONSIDERATIONS

These proposed changes have been evaluated against the standards in 10 CFR 50.92 and have been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed amendment would not:

- (i) involve a significant increase in the probability or consequences of an accident previously evaluated;

The change to have laboratory testing of charcoal adsorber samples performed at 30°C rather than 130°C does not increase the probability or consequences of an accident previously evaluated. This more realistic testing parameter (i.e., 30°C) will yield more realistic test results.

Information Notice (IN) 86-76, dated August 28, 1986, identified that testing at lower temperatures (e.g. 30°C vice 130°C) will yield lower efficiencies. The following was described in IN 86-76:

"Laboratory testing of charcoal efficiency is being performed at temperatures much higher than any temperature expected during the course of an accident. This can result in erroneously high efficiency measurements. Retention efficiencies as low as 70% were noted when samples of charcoal that had just passed its surveillance tests (greater than 90% efficient) were retested at 30°C."

The proposed activity change will not degrade or prevent actions described or assumed in an accident discussed in the FSAR. The proposed activity does not alter any assumptions previously made in evaluating the radiological consequences of an accident as described in the FSAR. The proposed activity does play a direct role in mitigating the radiological consequences of an accident described in the FSAR. The temperature reduction from 130°C to 30°C will result in lower efficiencies thereby increasing the likelihood that a charcoal adsorber would have to be replaced. This proposed change will continue to ensure that the Control Room environment is habitable for 30 days continuous occupancy without exceeding 5 Rem whole body dose, GDC 19. The proposed change will not use instrumentation with accuracies or response characteristics that are different than existing instrumentation. Further, the proposed change will not cause a change to any system interface in a way that would increase the likelihood of an accident. Additionally, the proposed change will not cause systems to be operated outside of their design or test limits. Therefore, the proposed activity does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Changing our charcoal adsorber bed sample removal and testing requirement from two to one representative carbon sample will not affect accident probabilities or consequences. Additionally, Generic Letter No. 83-13, "Clarification of Surveillance Requirements For HEPA Filters and



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Charcoal Adsorber Units in Standard Technical Specifications On ESF Cleanup Systems" provides the following wording, in part, in reference to obtaining of carbon samples:

"verifying ..., that a laboratory analysis of a representative carbon sample obtained in ..."

These words imply that a single sample is sufficient.

This proposed change is administrative in nature and would not affect the performance of the test. The intent of this requirement was to remove a large enough sample (representative), such that, in case one sample (or portion thereof) became unusable, a sufficient amount would still be available for performance of the test. The intent of this surveillance requirement is not to both obtain two samples and also perform two independent tests.

Changing the reference for in-place testing of HEPA filters and charcoal adsorbers from ANSI N510-1975 to Regulatory Guide 1.52 Positions C.5.a, C.5.c, and C.5.d is an administrative change. The three Regulatory Positions direct us to the same ANSI N510-1975 sections that we were using all along. Therefore, this change does not effect accident probabilities or consequences.

Clarifying the requirements to periodically verify that the Control Room has been isolated on a Control Room High Radiation alarm will not effect the probabilities of any accidents and could actually reduce the potential consequences of an accident if the verification finds valves not fully closed.

or (ii) create the possibility of a new or different type of accident from any accident previously evaluated;

None of these changes modify equipment design or operation. Therefore, none would create the possibility of a new or different accident.

or (iii) involve a significant reduction in a margin of safety.

The change to have laboratory testing of charcoal adsorber samples performed at 30°C from 130°C will cause results to be more conservative. As described in IN 86-76, testing of carbon samples at the temperatures realistically expected during the course of an accident (30°C) yields lower efficiencies, thereby increasing the likelihood of the charcoal adsorber being replaced. Therefore, this change does not effect any margin of safety and will continue to ensure compliance with the requirements of GDC 19.

**ENCLOSURE (1)**

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Regarding changing our charcoal adsorber bed sample removal and testing requirement from two down to one, the two samples taken in the past each were a representative sample for determining the condition of the charcoal bed. Taking one sample will still give a representative sample. Current regulatory guidance and industry practice do not indicate a need for more than one sample. Margin of safety is not effected by this change.

Changing the reference for in-place testing of HEPA filters and charcoal adsorbers from ANSI N510-1975 to Regulatory Guide 1.52 Positions C.5.a, C.5.c, and C.5.d is an administrative change. The three Regulatory Positions direct us to the same ANSI N510-1975 sections that we were using all along. Therefore, this change does not effect any margin of safety.

Clarifying the requirements to periodically verify that the Control Room has been isolated on a Control Room High Radiation alarm will actually increase the margin of safety in that there is more assurance that each valve will be checked closed and, therefore, the chances that the Control Room would not be totally isolated have been reduced.