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February 14, 1990

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 1; Docket No. 50-317
Technical Specification Change - HPSI Pump Operability in MODE 3
(TAC No. 75562)

REFERENCES: (a) Letter from Mr. G. C. Creel (BG&E) to Document Control Desk
(NRC), dated December 20, 1989, same subject
(b) Letter from Mr. G. C. Creel (BG&E) to Document Control Desk
(NRC), dated February 7, 1990, LTOP System Description

Gentlemen:

As requested by our NRC Project Manager on February 2, 1990, Baltimore Gas and Electric Company (BG&E) is providing additional clarification to a license amendment request (Reference (a)).

Reference (a) addressed the operability of high pressure safety injection (HPSI) pumps in MODE 3 by adding a footnote to Technical Specification Table 3.3-3 "Engineered Safety Features Actuation System Instrumentation." The footnote stated:

"When $T_{avg} \leq 350^{\circ}\text{F}$, the OPERABLE high pressure safety injection pump will be placed in pull-to-lock, and will not start automatically."

Because of LTOP concerns, HPSI pumps must be prevented from starting automatically when the RCS temperature is less than 319°F (Reference (b)). Analyses have been performed which demonstrate that taking the pumps out of service at RCS temperatures as high as 350°F has no adverse impact on safety. Therefore, upon approval of the amendment requested in Reference (a), we will change our operating procedures to require disabling two HPSI pumps during RCS cooldown (by removing their circuit breakers) and placing the third in pull-to-lock when the RCS temperature is between 350°F and 319°F . This process would be performed in the reverse during plant heatup. In this manner, inadvertent HPSI pump starts would be precluded.

However, when the RCS temperature is less than 319°F , there are situations when a HPSI pump must be used under manual control. Examples include use of the HPSI pump as an alternate boration means (TS 3.1.2.1, 3.1.2.3), mitigation of loss of shutdown

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cooling (pursuant to Generic Letter 88-17), or mitigation of an excessive reactor coolant system leak (Abnormal Operating Procedure 2-A). In all cases, the use of a HPSI pump when the RCS temperature is less than 319°F would be governed by approved procedures. These procedures will include operational restrictions described in Reference (b) to preclude RCS overpressure transients. A future license amendment request will incorporate these operational restrictions as part of Technical Specification 3.9.4.3.

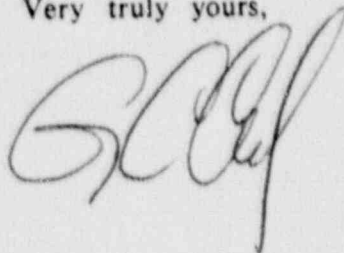
During discussions with the NRC Project Manager and the NRC Technical Reviewer, a concern was expressed that the strict wording of the above-mentioned proposed footnote could be interpreted to prevent the flexibility needed to take the remaining available HPSI pump out of pull-to-lock to support the required uses of the pump under manual control. Consequently, we agreed to propose a similar footnote for Technical Specification 3.5.3, ECCS Subsystems, which would clarify the operability definition of the HPSI pump in this regard. The footnote we propose to add is:

"When $T_{avg} \leq 350^{\circ}\text{F}$, the **OPERABLE** high pressure safety injection pump will be placed in pull-to-lock and will not start automatically. Manual use of the high pressure safety injection pump will be conducted in accordance with approved procedures."

This proposed footnote does not affect the significant hazards discussion presented in Reference (a). This change provides clarification of the definition of HPSI pump operability in Technical Specification 3.5.3 consistent with that defined and evaluated in Reference (a) for Technical Specification Table 3.3-3. We are proposing to operate HPSI pumps in a manner consistent with the LTOP requirements described in Reference (b). All HPSI pump operation will be in accordance with approved procedures which will contain controls to protect against overpressurization of the RCS. The margin of safety, presented in Reference (a), is preserved.

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

Very truly yours,



GCC/PSF/bjd

Attachments

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