



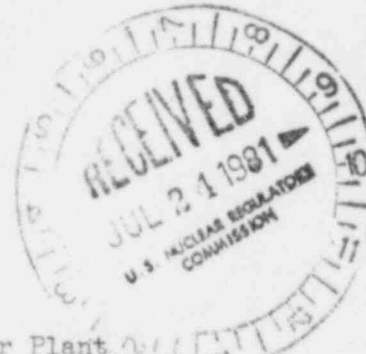
CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

July 21, 1981

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

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

Attn: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing



Subject: Calvert Cliffs Nuclear Power Plant
Units Nos. 1 & 2; Dockets Nos. 50-317 & 50-318
Automatic Initiation of Auxiliary Feedwater

References: (a) NRC letter dated 5/8/81 from R. A. Clark to
A. E. Lundvall, Jr.
(b) NRC letter dated 5/29/81 from R. A. Clark to
A. E. Lundvall, Jr.

Gentlemen:

Reference (a) forwarded Amendments 5⁴ and 37 for Units 1 and 2, respectively. The intent of these amendments was to require automatic initiation of Auxiliary Feedwater (AFW). In subsequent conversations between BG&E and the NRC, it was pointed out that the Technical Specification (TS) changes which were issued by Reference (a) contained no specific Limiting Conditions for Operation (LCO) for AFW flow and no Surveillance Requirements (SR) to insure the proper setting of the AFW throttle valves. Reference (b) requested us to provide an application for TS changes to specify LCO(s) and SR(s) as needed to implement automatic initiation of AFW within 60 days of receipt of reference (b).

After careful review, BG&E finds it necessary to request an extension of the TS submittal date to January 1, 1982. This extension is required for the following reasons:

- 1) An analysis must be performed to determine an allowable setpoint band and the amount of acceptable instrument error.
- 2) A test must be performed to verify the AFW flowrates versus steam generator pressure obtained by analysis. The test requires a shutdown of the affected unit to allow adequate variation in steam generator pressure.
- 3) Considerable time will be required for equipment procurement to allow adequate review and to obtain flow test instrumentation with high accuracy. Existing instrumentation has too great an error band to allow its use to set the AFW throttle valves.

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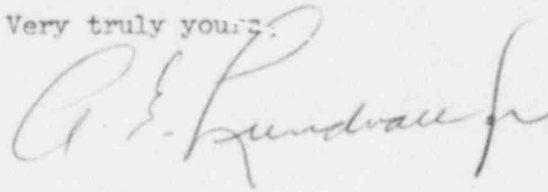
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It should be noted that at present the AFW pumps start automatically, and the control room operator is only required to open the remotely-operated AFW throttle valves to initiate flow to the steam generators. In addition, the operators have been sensitized to the importance of quickly and accurately determining the need for AFW flow. This provides adequate assurance that auxiliary feedwater flow will be available to the steam generators, when needed, pending the completion of our design and procurement efforts.

Please do not hesitate to call if you have any questions concerning this matter. We would appreciate your reply prior to August 1, 1981.

Very truly yours,



cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Messrs. E. L. Conner, Jr. - NRC
R. E. Architzel - NRC Resident Inspector
P. W. Kruse - CE