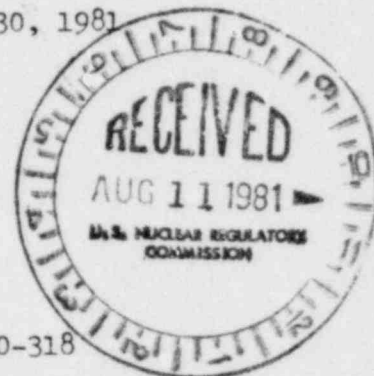




CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

July 30, 1981



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 Amendments

- References:
- (a) NRC letter dated 7/23/79 from R. W. Reid to A. E. Lundvall, Jr., Secondary Water Chemistry.
 - (b) BG&E letter dated 10/5/79 from A. E. Lundvall, Jr. to R. W. Reid, same subject.
 - (c) NRC letter dated 11/20/80 from D. G. Eisenhower to All Power Reactor Licensees, Technical Specification Revisions for Snubber Surveillance.

Dear Mr. Denton:

Baltimore Gas and Electric Company (BG&E) hereby requests Amendments for Operating Licenses DPR-53 and DPR-69 for Calvert Cliffs Units 1 and 2, respectively, with the submittal of the enclosed proposed changes to the Technical Specifications. All changes pertain to both Units unless otherwise indicated. The FCR Number shown on each change is for BG&E internal use only.

TECHNICAL SPECIFICATION CHANGES

Change No. 1 (FCR 81-14):

Delete Sections 3/4.7.1.6 and B3/4.7.1.6 and Tables 3.7-3 and 4.7-3, and insert the following Condition in Paragraph 2.C of the Operating License:

The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include:

1. Identification of a sampling schedule for the critical parameters and control points for these parameters;
2. Identification of the procedures used to quantify parameters that are critical to control points;

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3. Identification of process sampling points;
4. Procedure for the recording and management of data;
5. Procedures defining corrective actions for off control point chemistry conditions; and
6. A procedure identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action.

Discussion and Justification

The NRC's letter of July 23, 1979, Reference (a), requested that we submit a request to delete the existing Technical Specifications on secondary water chemistry and to incorporate the requirements of the model license condition which NRC had provided. Reference (b) informed NRC that we would submit a proposed change at a later date.

The above proposed license condition, which was written verbatim from the model, has been evaluated, and we have determined that our present secondary chemistry program complies with the license condition in all respects.

Change No. 2 (FCR 81-19):

Change Paragraph 3.10.5.a as shown on the attached marked-up page 3/4 10-5;

Change Paragraph 3.9.8.1.a as shown on the attached marked-up page 3/4 9-8.

Discussion and Justification:

Surveillance Requirement 4.10.5.1 states that the charging pumps shall be verified de-energized and the charging flowpaths shall be verified closed at least once per hour. This requirement implies that the associated Limiting Condition for operation (LCO) 3.10.5.a is meant to require that the pumps and flowpaths are so isolated. However, the present wording of the LCO does not specifically do so. The proposed change will direct the operator to place the charging pumps and flowpaths in the required condition, consistent with the Surveillance Requirement.

Similarly, Action Statement (a) for LCO 3.9.8.1, as presently worded, does not provide the operator with specific guidance as to how to suspend dilution operations. Inasmuch as Paragraph 3/4.10.5 specifically addresses the charging pumps and flowpaths, there should be consistency between 3/4.10.5 and 3/4.9.8.1. In addition, an asterisk(*) has been added as shown to reiterate the existing footnote pertaining to when a shutdown cooling loop may be removed from operation.

Change No. 3 (FCR 81-28):

Change Limiting Condition for Operation (LCO) 3.7.6.1.d and Action Statements (b) and (d) as shown on the attached marked-up page 3/4 7-17.

Discussion and Justification:

As presently worded, LCO 3.7.6.1.d and Action Statement (d) incorrectly identify which exhaust duct isolation valves must be OPERABLE in the Control Room ventilation system. The proposed change correctly identifies the duct in which the valves must be OPERABLE.

Action Statement (b) is being changed to account for the fact that the Control Room air-conditioning units may be inoperable without jeopardizing the safety of the plant so long as the Control Room temperature remains within limits. It is unnecessarily restrictive to cause the plant to be shut down when an air-conditioning unit is inoperable if it can be demonstrated that the Control Room temperature can be maintained within acceptable limits even without the air-conditioning unit(s). The conservative (reduced) temperature limit of 110°F has been selected as the Action criterion in lieu of the existing criterion (one a/c unit inoperable). This temperature limit allows a substantial margin of 10°F before the design temperature limit of the Control Room would be reached.

Change No. 4 (FCR 81-41) (Unit No. 2 Only):

Delete Hydraulic Snubber 2-38-1 from Table 3.7-4, page 3/4 7-31.

Discussion and Justification:

As part of a plant modification, the leak-off line for valve 2-CV-5466 was removed and plugged. Snubber 2-38-1 was attached to the removed leak-off line and, therefore, was removed. Accordingly, snubber 2-38-1 should be deleted from Table 3.7-4.

Change No. 5 (FCR 81-49):

- a. Replace Technical Specification section 3/4.7.8 pages 3/4 7-25 and 3/4 7-26 with the attached revised pages and add attached new page 3/4 7-26a.
- b. Replace Bases section 3/4.7.8 page B 3/4 7-5 with the attached revised page.
- c. Add a new subparagraph 6.10.2.m as shown on the attached page 6-20.
- d. Modify/add to the footnotes at the end of Table 3.7-4 (page 3/4 7-61a Unit 1; page 3/4 7-53 Unit 2) as shown on the attached composite marked-up page. Also change the heading of column 4 for every page in Table 3.7-4 to read: "HIGH EXPOSURE ZONE" as shown.
- e. Delete Table 4.7-4 (page 3/4 7-62 Unit 1; page 3/4 7-54 Unit 2).

- f. Add a triple asterisk (***) next to the existing brackets for the Steam Generator snubbers on pages 3/4 7-51 and 7-52 for Unit 1 and pages 3/4 7-45 and 7-46 for Unit 2.

Discussion and Justification:

The proposed changes are in response to an NRC request, Reference (c), as modified to be consistent with the Calvert Cliffs design and operating practices and considering the latest ASME guidelines (draft ASME OM-4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers).")

Change No. 6 (FCR 81-1017):

Change the last sentence of the second paragraph of Bases paragraph 3/4.7.1.2, on page B 3/4 7-2 to read as follows:

"A flow of 450 gpm has been determined to be sufficient to ensure that adequate feedwater..."

Discussion and Justification:

As presently worded, the basis for Technical Specification 3/4.7.1.2 implies that the full rated flow (700 gpm) of an auxiliary feedwater pump is required to provide adequate decay heat removal. In fact, calculations performed by the NSSS Supplier have shown that a flow of about 450 gpm is adequate to perform this function. Therefore, this clarification should be made in the basis to preclude misinterpretation of design data and functional requirements by NRC inspectors and/or plant personnel.

SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications have been reviewed by our Plant Operations and Safety Review Committee and Off-Site Safety and Review Committee, and they have concluded that implementation of these changes will not result in an undue risk to the public health and safety.

July 30, 1981

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 Nos. 1 and 2, respectively, and, accordingly, we are including BG&E Check No. A01308⁴ in the amount of \$12,700.00 to cover the fee for this request.

BALTIMORE GAS AND ELECTRIC COMPANY

By: 

Vice President, Supply

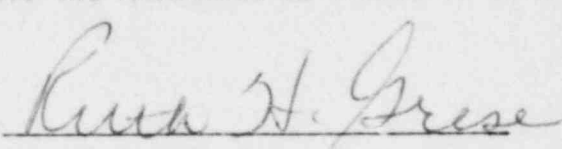
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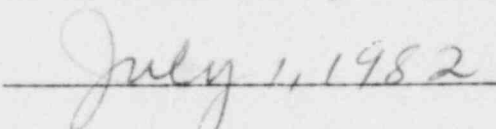
CITY OF BALTIMORE:

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 purpose 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:


July 1, 1982

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Messrs. E. L. Conner, Jr. - NRC
R. E. Architzel - NRC