

BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

NUCLEAR POWER DEPARTMENT
CALVERT CLIFFS NUCLEAR POWER PLANT
LUSBY, MARYLAND 20657

August 5, 1981

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

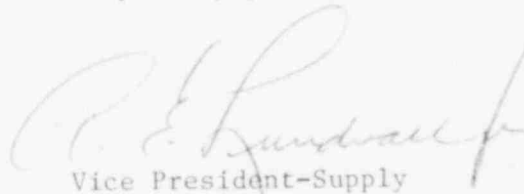
ATTENTION: Mr. Gary L. Snyder, Chief Emergency Preparedness
and Program Support Branch, Division of Emergency
Preparedness and Operational Support

Gentlemen:

This refers to your Inspection Report 50-317/81-08; 50-318/31-08, which
transmitted one item of apparent noncompliance with NRC requirements.
Inclosure (1) to this letter is a written statement in reply to that
item in your letter of July 13, 1981.

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

Very truly yours,



R. E. Lundvall
Vice President-Supply

AEL/DWL/gla

Enclosure (1)

August 5, 1981

STATE OF MARYLAND:

: TO WIT:

CITY OF BALTIMORE:

Arthur 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 provides the foregoing response for the purposes therein set forth; that the statements 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:

Richard H. Brown
Notary Public

My Commission Expires:

July 1, 1982

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Director, Office of Inspection & Enforcement
R. E. Architzel, NRC Resident Inspector

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/81-08; 50-318/81-08

Section 3.2, Table 3.2-1 of the Environmental Technical Specification for Calvert Cliffs Units 1 and 2 requires, in part, that edible species of fish be sampled from the catch made by commercial fisherman, and that the fish bone be analyzed for Sr-89, 90.

During the third quarter of 1980 fish samples consisted of spot, flounder, weakfish, and bluefish; the fourth quarter of 1980 samples consisted of flounder and bluefish. It should be pointed out that, on the average, the skeletal structure of the fish commonly referred to as fish bone is a small percentage of its weight, and that the theoretically calculated minimum amount of fish required to get sufficient bones to produce enough Sr-89, 90 at the required LLD levels may be as much as 37.5 Kg for selected species. It should also be pointed out, as Mr. George H. Smith of your office properly did in his letter of June 25, 1979, to Mr. A. E. Lundvall, Jr., that the parameters involved in determining the LLD are counter efficiency, counter background, sample size and chemical recovery. The latter two parameters are highly variable and subject to little control.

Since July 1979, our contractor has recognized that their analytical procedure for radiostrontium requires, and consequently undertook, special studies to achieve the required LLD's for Sr-89, 90. On the basis of these studies, the procedure has been revised and some improvement in Sr-89, 90 LLD's have been achieved. Studies are being continued to achieve full compliance as soon as feasible.

The latest NRC guidance on Standard Radiological Effluent Technical Specification (STS) for PWR's eliminates the radiostrontium analyses of fish bone. Using this guidance and at the direction of the NRC a proposed STS package for Calvert Cliffs was submitted March 15, 1979, which among other things deleted the radiostrontium analyses. We are again reviewing the proposed STS package, and plan to resubmit it by September 15, 1981. We hope the NRC can act quickly to approve either of our submissions deleting the radiostrontium analysis from our Technical Specifications.