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VICE PRESIDENT
NUCLEAR ENERGY
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May 24, 1991

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
Request for Amendment; Reactor Vessel Specimen Withdrawal Schedule

REFERENCE: (a) Generic Letter 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications," dated January 4, 1991

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 & 2, respectively, with the submittal of the proposed changes to the Technical Specifications.

DESCRIPTION

The proposed amendment would revise the Technical Specification for both Units 1 and 2 to remove the schedule for the withdrawal of reactor vessel material specimens. Section II.B.3 of Appendix H to 10 CFR Part 50 requires the submittal to, and approval by, the Nuclear Regulatory Commission of a proposed withdrawal schedule for material specimens before implementation. Hence, the placement of this schedule in the Technical Specifications duplicates the control on changes to this schedule that have been established by Appendix H.

BACKGROUND

Technical Specifications include limiting conditions for operation that establish pressure and temperature limits for the reactor coolant system. The limits are defined by Technical Specification figures that provide an acceptable range of operating temperatures and pressures for heatup, cooldown, criticality, and inservice leak and hydrostatic testing. These limits are generally valid for a specified number of effective full power years. A program for reactor vessel material surveillance ensures the availability of data to update the inservice operating temperature and pressure limits. This program assists in fulfilling the requirements of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR) to prevent brittle fracture of the reactor vessel.

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The surveillance requirements associated with these limits specify the withdrawal schedule for the reactor vessel material specimens. Recently, the staff of the U. S. Nuclear Regulatory Commission (NRC) approved a request to remove this schedule from the Technical Specification for another nuclear power plant. This change was requested because the Technical Specification was a duplicate of requirements within Section II.B.3 of Appendix H of 10 CFR Part 50. Duplication of requirements is unnecessary and provides a basis for removal from the Technical Specification as a line item improvement consistent with the Commission Policy Statement on Technical Specification Improvements. The NRC recognized the generic applicability of this request and issued Generic Letter 91-01 to provide guidance to other licensees for deleting the withdrawal schedule.

REQUESTED CHANGE

Change pages 3/4 4-23 and 3/4 4-25 of the Unit 1 Technical Specifications, pages 3/4 4-24 and 3/4 4-26 of the Unit 2 Technical Specifications, and page B3/4 4-5 of the associated Unit 1 and Unit 2 Bases as shown on the marked-up pages in Attachments A and B.

SAFETY ANALYSES/JUSTIFICATION

Limiting condition for operation (LCO) 3.4.9.1 for the reactor coolant system includes operating limits on pressure and temperature, defined in Figure 3.4-2, that provide an acceptable region for operation during heatup, cooldown, criticality, and inservice leak and hydrostatic testing. An associated surveillance requirement, SURVEILLANCE REQUIREMENT 4.4.9.1.1, addresses the frequency of verifying that operation is within the specified limits during these operating conditions. In addition, a separate surveillance, SURVEILLANCE REQUIREMENT 4.4.9.1.2, includes the requirement that reactor vessel material surveillance specimens be removed and examined to determine changes in material properties, as required by 10 CFR Part 50, Appendix H, and in accordance with the schedule in Technical Specification Table 4.4-5. The Technical Specification table and the reference to this table providing the schedule for withdrawal of the reactor vessel material surveillance specimens are requested to be removed from this surveillance requirement. This surveillance requirement also specifies that the results of these examinations shall be used to update the Technical Specification figures for the pressure and temperature operating limits. This requirement is being retained.

The Bases Section for this Technical Specification is being revised to provide a detailed description of the bases for this LCO and the associated surveillance requirements. These bases state that the heatup and cooldown curves are recalculated when data from the surveillance specimens indicate a change in material properties that exceed the limiting value of those properties that were used to develop the existing pressure and temperature limits. These bases also provide information on the use of the data obtained from material specimens. This information defines the purpose and relationship of this information to the requirements included in the regulations and the American Society of Mechanical Engineers (ASME) Code. Therefore, the removal of the schedule for specimen withdrawal from the Technical Specification will not result in any loss of clarity related to regulatory requirements of Appendix H to 10 CFR Part 50.

Finally, the Updated Final Safety Analysis Report (UFSAR) will be revised to incorporate the related information in accordance with 10 CFR 50.71. Additional information will be included to incorporate a table of the limiting values of reactor vessel material properties, and to update the description of the methods used to predict the effect of neutron radiation on reactor vessel materials. The UFSAR currently includes the NRC approved reactor vessel material irradiation surveillance

schedule in Table 4-13 of Section 4.1.5.3. This schedule will be updated to reflect future NRC approved changes to the specimen withdrawal schedule.

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendment:

(1) *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The removal from the Technical Specification of the schedule for the withdrawal of reactor vessel material surveillance specimens will not result in any loss of regulatory control because changes to this schedule are controlled by the requirements of Appendix H to 10 CFR Part 50 which require NRC approval and are maintained in the Updated Final Safety Analysis Report. In addition, the surveillance requirements on pressure and temperature indicate that the specimens must be removed and examined to determine changes in their material properties, and these results must be used to update the pressure and temperature limits. Therefore, no actual change in the required actions would occur and the change would not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

The requested change would not result in any change to the plant design, hardware or procedures for operation. Therefore, the requested change would not create the possibility of a new or different type of accident from any accident previously evaluated.

(3) *Would not involve a significant reduction in a margin of safety.*

The requested change would neither result in fewer nor less frequent removal and examination of the reactor vessel material irradiation surveillance specimens, nor would it result in any change to the required use of the results of the examinations. Therefore, the pressure and temperature requirements for the reactor coolant system would be maintained in the same manner and the change would not involve a significant reduction in a margin of safety.

SCHEDULE

This change is requested to be approved and issued by August 30, 1991. However, issuance of this amendment is not currently identified as having an impact on outage completion or continued plant operation.

SAFETY COMMITTEE REVIEW

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

Very truly yours,

GCC

STATE OF MARYLAND :
: TO WIT :
COUNTY OF CALVERT :

I hereby certify that on the 23rd day of May, 1991, before me, the subscriber, a Notary Public of the State of Maryland in and for Calvert 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 information 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 information on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:

Michelle D. Hall
Notary Public

My Commission Expires:

February 3, 1994
Date

GCC/ERG/erg/dlm

Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
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