



1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

ROBERT E. DENTON
VICE PRESIDENT
NUCLEAR ENERGY
(410) 260-4455

April 1, 1993

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
License Amendment Request; Operating License Administrative Changes

REFERENCES: (a) Letter from Mr. J. W. Gore (BG&E) to Mr. B. C. Rusche (NRC),
dated October 25, 1976, Amendment to Operating License DPR-69
(b) Letter from NRC to Mr. J. W. Gore (BG&E), dated
November 30, 1976, Issuance of Amendment No. 2 to Facility
Operating License DPR-69

Gentlemen:

Pursuant to 10 CFR 50.90, the Baltimore Gas and Electric Company (BG&E) hereby requests an Amendment to Operating License Nos. DPR-53 and DPR-69 by the incorporation of the changes described below into the Operating Licenses for Calvert Cliffs Unit Nos. 1 and 2.

DESCRIPTION

The proposed amendment requests administrative changes to the Operating Licenses for Unit Nos. 1 and 2 by deleting outdated license conditions.

BACKGROUND

Facility Operating License No. DPR-53 (Unit 1) and Facility Operating License No. DPR-69 (Unit 2) were issued to BG&E on July 31, 1974 and August 13, 1976, respectively. Subsequently, the Unit 1 Operating License has been substantively amended at least 14 times and the Unit 2 Operating License substantively amended at least 12 times. All changes made to the Unit 1 Operating License have been either handwritten or cut and pasted into the license. The Unit 2 Operating License was reissued in total by Amendment 2 and all ensuing changes to the Unit 2 Operating License have been

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handwritten or cut and pasted into the license. At present, both licenses contain faded text and handwritten changes. As a result, some portions of the licenses are almost illegible.

Aside from legibility, the licenses contain outdated license conditions. The outdated conditions for the most part deal with incomplete construction items, pre-operational tests and startup tests. Other outdated conditions involve additional surveillances, the outcome of legal proceedings, the studies associated with the selection of an optimum cooling tower system, and a one-time exemption from compliance with the charcoal testing Technical Specifications. The Requested Change Section of this letter lists the paragraph numbers and the item numbers of the license conditions we request be deleted from the licenses. These license conditions have either been completed to the satisfaction of the Commission, or as the result of time or circumstance, no longer apply.

REQUESTED CHANGE

Facility Operating License No. DPR-53

This request for amendment makes the following administrative and editorial changes to the Unit 1 Operating License. The requested changes are briefly described below. Detailed justification is discussed in the next section.

We request a totally retyped license. The retyped license should incorporate the changes described below as well as remove all paragraphs previously deleted by past amendments.

1. Paragraph 2.C.(3) - DELETE - all three paragraphs except the first sentence of the third paragraph, "The licensee is required to implement and maintain the administrative controls identified in Section 6 of the NRC's Fire Protection Safety Evaluation on the facility dated September 14, 1979."
2. Paragraph 2.D - DELETE

"Incomplete Construction and Pre-operational Test Items that are Required to be Completed"
3. Item A.1.a - DELETE
4. Item A.1.b - DELETE
5. Item A.1.c - DELETE
6. Item A.1.d - DELETE
7. Item A.2.a - DELETE
8. Item A.2.b - DELETE
9. Item A.2.c - DELETE
10. Item B.1.a - DELETE
11. Item B.1.b - DELETE

12. Item B.1.c - DELETE
13. Item B.2.a - DELETE
14. Item C.1.a - DELETE
15. Item C.1.b - DELETE
16. Item C.2.a - DELETE
17. Item C.2.b - DELETE
18. Item C.2.c - DELETE
19. Item C.2.d - DELETE

Facility Operating License No. DPR-69

This request for amendment makes the following administrative and editorial changes to the Unit 2 Operating License. The requested changes are briefly described below. Detailed justification is discussed in the next section.

We request a totally retyped license. The retyped license should incorporate the changes described below as well as remove all paragraphs previously deleted by past amendments.

1. Paragraph 2.C.2.a - DELETE
2. Paragraph 2.C.3, - DELETE - *"Incomplete Construction Items, Tests, and Other Items"*
3. Paragraph 2.C.4, - DELETE - *"Additional Reactivity and Power Distribution Surveillance"*
4. Paragraph 2.C.6, - DELETE - All three paragraphs except the first sentence of the third paragraph, "The licensee is required to implement and maintain the administrative controls identified in Section 6 of the NRC's Fire Protection Safety Evaluation on the facility dated September 14, 1979."
5. Paragraph 2.E - DELETE
6. Paragraph 2.G - DELETE

JUSTIFICATION

The administrative changes listed in the Requested Changes Section delete license conditions which have been met by BG&E and acknowledged as satisfactory by the NRC.

This letter requests a large number of changes to the Operating Licenses as did Reference (a). In response to that application, NRC issued an amendment transmitted by Reference (b). In that case, the NRC chose to retype the license and reissue the document to BG&E. Given the similar

circumstances, we request that the NRC totally retype the licenses. Retyping the licenses, not including their Appendices, will provide BG&E with Operating Licenses containing only those license conditions that apply and remain open and improve the legibility of the licenses.

Facility Operating License No. DPR-53

1. Paragraph 2.C.(3)

Paragraph 2.C.(3) requires us to complete the modifications identified in Paragraphs 3.1.1 through 3.1.21 of the NRC's Fire Protection Safety Evaluation Report (FPSEER) for Calvert Cliffs, dated September 14, 1979, submit additional information identified in Table 3.2 of the FPSEER, and implement the administrative controls identified in Section 6 of the FPSEER. The NRC's Safety Evaluation, dated September 27, 1982, indicates that these license conditions have been completed. Specifically, the first, second and third supplements to the NRC's September 14, 1979 FPSEER, dated October 2, 1980, March 18, 1982, and September 27, 1982, respectively, and the Exemption dated August 16, 1982, resolve all outstanding items in the FPSEER. As these license requirements have been met, we request that 2.C.(3), except the first sentence of the third paragraph, be removed from the Facility Operating License.

2. Paragraph 2.D

Paragraph 2.D requires us to select an optimum cooling tower system and complete the preliminary design and engineering work of the selected system prior to exceeding 60% capacity, but in no event later than six months after the date of commercial operation. This item has been completed and was documented in a letter from BG&E to the NRC dated January 30, 1975. The NRC did not acknowledge receipt of this letter. However, a copy of the preliminary design and engineering report is available for your inspection. As this license requirement has been met, we request that the requirement for the cooling tower study be removed from the Facility Operating License.

"Incomplete Construction and Pre-operational Test Items that are Required to be Completed"

3. Item A.1.a

Item A.1.a is a license condition requiring the completion of Reactor Protective System (RPS) pre-operational testing prior to proceeding beyond fuel loading. We have satisfied this license condition. Satisfactory completion of RPS pre-operational testing excepting that portion related to Reactor Coolant System (RCS) flow is documented in Inspection Report (INSR) 50-317/74-33 (Details, Paragraph 4), dated August 13, 1974. Loop Flow Tests were satisfactorily completed and results reviewed and approved as documented in INSR 50-317/74-36 (Details, Paragraph 3.c), dated September 10, 1974. Therefore, we request that this condition be deleted.

4. Item A.1.b

Item A.1.b is a license condition requiring the completion of Control Element Drive Mechanism (CEDM) Cooling System pre-operational testing prior to proceeding beyond fuel loading. We have satisfied this license condition. Baltimore Gas and Electric Company notified the Directorate of Regulatory Operations Region I on September 2, 1974 by telephone that the CEDM Cooling System had been satisfactorily tested and the results reviewed and approved. The telephone notification is documented in INSR 50-317/74-36 (Details, Paragraph 3.d), dated September 10, 1974. Satisfactory completion of CEDM Cooling System pre-operational testing is documented in INSR 50-317/74-38 (Details, Paragraph 2), dated November 7, 1974. Therefore, we request that this condition be deleted.

5. Item A.1.c

Item A.1.c is a license condition requiring the completion of Reactor Component Handling pre-operational testing prior to proceeding beyond fuel loading. We have satisfied this license condition. Satisfactory completion of Reactor Component Handling pre-operational testing with the exception of verification of the reactor vessel head installation procedures is documented in INSR 50-317/74-33 (Details, Paragraph 4.c), dated August 13, 1974. Inspection Report 50-317/74-36 (Details, Paragraph 3.b), dated September 10, 1974, documents the accomplishment of Maintenance Procedure HE-16, Removal Of RV Head Lift Rig, on August 23, 1974. A search of the Calvert Cliffs docket revealed no additional open items or closure documentation related to verification of reactor vessel head installation procedures. Therefore, we request that this condition be deleted.

6. Item A.1.d

Item A.1.d is a license condition requiring the completion of Main Steam Isolation Valves (MSIV) pre-operational testing prior to proceeding beyond fuel loading. We have satisfied this license condition. Satisfactory completion of MSIV pre-operational testing with the exception of the test of the level alarms on the hydraulic oil reservoirs was documented in INSR 50-317/74-33 (Details, Paragraph 4.d), dated August 13, 1974. Satisfactory completion of the test of the level alarms on the hydraulic oil reservoirs is documented in INSR 50-317/74-36 (Details, Paragraph 3.a), dated September 10, 1974. Therefore, we request that this condition be deleted.

7. Item A.2.a

Item A.2.a is an incomplete construction license condition requiring the establishment of administrative controls to preclude inadvertent over-pressurization of the RCS during solid system operation prior to proceeding beyond fuel loading. We satisfactorily completed this license condition by establishing Standing Instruction No. 74-3. These administrative controls are currently contained in OP-05, Plant Shutdown from Hot Standby to Cold Shutdown. Satisfactory completion of this license condition is documented in INSR 50-317/74-35 (Details, Paragraph 4), dated August 29, 1974. Therefore, we request that this condition be deleted.

8. Item A.2.b

Item A.2.b is an incomplete construction license condition requiring the addition of spacers and the replacement of expansion joints in the saltwater cooling system that were found to be elongated beyond their design limits prior to proceeding beyond fuel loading. We have satisfactorily completed this license condition. Satisfactory completion of this license condition is documented in INSR No. 50-317/74-35 (Details, Paragraph 6), dated August 29, 1974. Therefore, we request that this condition be deleted.

9. Item A.2.c

Item A.2.c is an incomplete construction license condition requiring the completion of the hydrogen supply line to the volume control tank prior to proceeding beyond fuel loading. We have satisfactorily completed this license condition. Satisfactory completion of this license condition is documented in INSR 50-317/74-35 (Details, Paragraph 7), dated August 29, 1974. Therefore, we request that this condition be deleted.

10. Item B.1.a

Item B.1.a is a license condition requiring the completion of pre-operational tests of the Liquid Waste System Evaporators prior to proceeding beyond the post-core loading hot functional testing. We have satisfactorily completed this license condition. Satisfactory completion of this license condition is documented in INSR 50-317/74-38 (Details, Paragraph 2), dated November 7, 1974. Therefore, we request that this condition be deleted.

11. Item B.1.b

Item B.1.b is a license condition requiring the completion of pre-operational tests of the Radiation Monitoring and Process Radiation Systems prior to proceeding beyond the post-core loading hot functional testing. We have satisfactorily completed this license condition. Baltimore Gas and Electric Company tested, calibrated and reviewed test results for the containment area monitors, refueling area monitors, plant ventilation monitor, liquid waste monitor and refueling area exhaust monitor. These actions were reviewed and documented in INSR 50-317/74-33 (Details, Paragraph 4.b), dated August 13, 1974. Satisfactory completion of Radiation Monitoring and Process Radiation Systems pre-operational testing is documented in INSR 50-317/74-38 (Details, Paragraph 2), dated November 7, 1974. Therefore, we request that this condition be deleted.

12. Item B.1.c

Item B.1.c is a license condition requiring the completion of pre-operational tests of the Variable Overpower Trip System prior to proceeding beyond the post-core loading hot functional testing. We have satisfactorily completed this license condition. Satisfactory completion of this license condition is documented in INSR 50-317/74-36 [Details, Paragraph 3.c(2)], dated September 10, 1974. Therefore, we request that this condition be deleted.

13. Item B.2.a

Item B.2.a is a license condition requiring the completion of installation and design documentation of safety-related pipe hangers, restraints and supports prior to proceeding beyond the post-core loading hot functional testing. We have satisfied this license condition. Inspection Report 50-317/74-38 (Details, Paragraph 3), dated November 7, 1974, documents that BG&E has completed installation and inspection of safety-related hangers, restraints and supports. Inspection Report 50-317/74-38 (Details, Paragraph 3) also documents that BG&E reported that all construction activity is complete in all respects including design documentation as specified by Enclosure 2 to the Operating License. Item B.2.a was considered resolved pending review of documentation as stated in INSR 50-317/74-38 (Details, Paragraph 3). After subsequent review of the design documentation during an inspection documented in INSR 50-317/74-39 (Details, Paragraph 7), dated November 6, 1974, this item was considered resolved. Therefore, we request that this condition be deleted.

14. Item C.1.a

Item C.1.a is a license condition requiring the completion of Solid Waste Processing System pre-operational testing prior to proceeding beyond low power physics tests. We have satisfied this license condition. Inspection Report 50-317/74-38 (Details, Paragraphs 2 and 22), dated November 7, 1974, documented that "pre-operational testing has been completed, reviewed and approved with exception of PO 61 - 'Solid Waste' which is to be completed on the interim modified solid waste system prior to power escalation." During an inspection documented in INSR 50-317/74-39 (Summary of Findings, Paragraph A.4 and Details, Paragraph 3), dated November 6, 1974, the inspector reviewed pre-operational test procedure (No. 61) "Solid Radwaste System," Revision No. 1, and identified no discrepancies in the review process or in the "as-performed" procedure. Baltimore Gas and Electric Company completed the pre-operational testing of the interim modified Solid Waste System on October 29, 1974, and the test results were reviewed by the Test Program Coordinator, POSRC and the Calvert Cliffs Chief Engineer on October 30, 1974. Test Program Coordinator and POSRC review of the test results is documented in INSR 50-317/74-39 (Details, Paragraph 3), dated November 6, 1974. Calvert Cliffs Chief Engineer review of the test results and Item C.1.a resolution is documented in INSR 50-317/75-09 (Details, Paragraph 4), dated April 22, 1975. Therefore, we request that this condition be deleted.

15. Item C.1.b

Item C.1.b is a license condition requiring the completion of pre-operational tests of the Hydrogen Purge System prior to proceeding beyond the low power physics tests. We have satisfactorily completed this license condition. Satisfactory completion of this license condition is documented in INSR 50-317/74-38 (Details, Paragraph 2), dated November 7, 1974. Therefore, we request that this condition be deleted.

16. Item C.2.a

Item C.2.a is a license condition requiring the completion of an evaluation of the adequacy of the diesel generator air start system modifications prior to proceeding beyond the low power physics tests. We have satisfactorily completed this license condition. By letter dated October 21, 1974 to the Acting Director, Directorate of Licensing, we submitted a report which verified the adequacy of the diesel generator (Nos. 11 and 12) air start system modifications. The NRC reviewed our applicable records during inspections documented in INSR 50-317/74-35 (Details, Paragraph 2), dated August 29, 1974, and INSR 50-317/74-39 (Details, Paragraph 5), dated November 6, 1974. Satisfactory completion of this license condition is documented in INSR 50-317/74-39 (Summary of Findings, Paragraph B.1), dated November 6, 1974. Therefore, we request that this condition be deleted.

17. Item C.2.b

Item C.2.b is a license condition requiring the completion of incore instrumentation prior to proceeding beyond the low power physics tests. We have satisfactorily completed this license condition. On August 27, 1974, during an inspection documented in INSR 50-317/74-36 (Details, Paragraph 5), dated September 10, 1974, BG&E described two problems encountered during installation of the incore detectors. At that time, we were evaluating these events with respect to the Non-Routine Reporting requirements in the Technical Specifications. During an inspection documented in INSR 50-317/74-37 (Details, Paragraph 7), dated September 16, 1974, the inspector concurred with BG&E that no report would be necessary with respect to the two problems encountered during installation of the incore detectors. Satisfactory completion of this license condition is documented in INSR 50-317/74-38 (Details, Paragraph 6), dated November 7, 1974. Therefore, we request that this condition be deleted.

18. Item C.2.c

Item C.2.c is a license condition requiring the completion of reactor internals vibration monitoring capability prior to proceeding beyond the low power physics tests. We have satisfactorily completed this license condition. During an inspection documented in INSR 50-317/75-01 (Details, Paragraph 3.a), dated January 29, 1975, the procedure and equipment were found by the inspector to satisfy Item C.2.c. Therefore, we request that this condition be deleted.

Additionally, the resolution of the vibration monitoring unresolved item is documented in combined INSR 50-317/77-07 and 50-318/77-06 (Details, Paragraph 8.a), dated March 9, 1977. The inspector reviewed the installation and determined that adequate separation existed between the vibration monitoring equipment for the two units.

19. Item C.2.d

Item C.2.d is a license condition requiring the completion of the modification of the primary Control Element Assembly (CEA) position indication system prior to proceeding beyond low power physics tests. We have satisfactorily completed this license condition. Installation of the modification began on August 19, 1974, and was completed on August 30, 1974. During an inspection documented in INSR 50-317/74-38 (Details, Paragraph 8), dated November 7, 1974, the inspector noted that the additional modifications to the primary CEA position indication system (to insure CEA motion cessation) are complete and that Item C.2.d is considered closed. Therefore, we request that this condition be deleted.

Facility Operating License No. DPR-69

1. Paragraph 2.C.2.a

Paragraph 2.C.2.a of the amended Facility Operating License states:

- a. The Licensee shall be exempted from compliance with the following Appendix A Technical Specifications applying to charcoal testing until (1) the first regularly scheduled refueling outage, or (2) the currently installed charcoal is replaced, whichever occurs first:

4.6.3.1.b.3
4.6.6.1.b.3
4.7.6.1.c.3
4.7.7.1.b.3
4.9.12.b.3

As the first regularly scheduled refueling outage began on September 15, 1978, Paragraph 2.C.3 of the amended Facility Operating License no longer applies. Therefore, we request that this condition be deleted.

2. Paragraph 2.C.3, "Incomplete Construction Items, Tests, and Other Items"

Paragraph 2.C.3 of the amended Facility Operating License contains license conditions which shall be completed to the satisfaction of the Commission prior to achieving certain specified operating conditions or proceeding with operations beyond certain specified dates. We have satisfied these license conditions. Satisfactory completion of paragraphs 2.C.3.a.(1) and 2.C.3.a.(2) and authorization to operate Calvert Cliffs Unit No. 2 in Mode 1 are documented in a letter from NRC to Mr. J. W. Gore (BG&E), dated December 3, 1976. Satisfactory completion of paragraphs 2.C.3.b.(1) and authorization to continue to operate Calvert Cliffs Unit No. 2 at full power are documented in a letter from NRC to Mr. J. W. Gore (BG&E), dated January 28, 1977. Therefore, we request that this condition be deleted.

3. Paragraph 2.C.4, "Additional Reactivity and Power Distribution Surveillance"

Paragraph 2.C.4 of the amended Facility Operating License contains a license condition requiring that prior to the first regularly scheduled refueling outage, during operation at or above 50 percent of rated thermal power, a surveillance to provide early detection of reactivity or power distribution anomalies shall be performed. The results were to be included in the Monthly Operating Report. We have satisfied this license condition. The results of the surveillance were included in the following Monthly Operating Reports:

January, 1977, dated February 10, 1977
February, 1977, dated March 9, 1977
March 1977, dated April 11, 1977
April 1977, dated May 11, 1977
May 1977, dated June 9, 1977
June 1977, dated July 13, 1977
July 1977, dated August 9, 1977
August 1977, dated September 9, 1977
September 1977, dated October 10, 1977
October 1977, dated November 9, 1977
November 1977, dated December 8, 1977
December 1977, dated January 9, 1978
January 1978, dated February 8, 1978
February 1978, dated March 9, 1978
March 1978, dated April 10, 1978
April 1978, dated May 15, 1978
May 1978, dated June 15, 1978
June 1978, dated July 15, 1978
July 1978, dated August 15, 1978
August 1978, dated September 15, 1978
September 1978, dated October 15, 1978

The first regularly scheduled refueling outage began on September 15, 1978. Including the results of the surveillance in the Monthly Operating Report for the period during which Unit 2 operated at or above 50 percent of rated thermal power prior to the first regularly scheduled refueling outage satisfactorily completed this license condition. Therefore, we request that this condition be deleted.

4. Paragraph 2.C.6

Paragraph 2.C.6 requires us to complete the modifications identified in Paragraphs 3.1.1 through 3.1.21 of the NRC's Fire Protection Safety Evaluation Report (FPSEER) for Calvert Cliffs, dated September 14, 1979, submit additional information identified in Table 3.2 of the FPSEER, and implement the administrative controls identified in Section 6 of the FPSEER. The NRC's Safety Evaluation, dated September 27, 1982, indicates that these license conditions have been completed. Specifically, the first, second and third supplements to the NRC's September 14, 1979 FPSEER, dated October 2, 1980, March 18, 1982, and September 27, 1982, respectively, and the Exemption dated August 16, 1982, resolve all outstanding items in the FPSEER. As these license requirements have been met, we request that 2.C.6, except the first sentence of the third paragraph, be removed from the Facility Operating License.

5. Paragraph 2.E

Paragraph 2.E states, "Information previously contained in 2.E now contained in 2.D.2, per Amdt. #32, 2-20-81." This information is available in other docketed information and is not a license condition. The removal of this paragraph is in keeping with the proposed administrative clean-up of the license.

6. Paragraph 2.G

The United States Court of Appeals for the D. C. Circuit decision favoring the Natural Resources Defense Council was essentially overruled by the United States Supreme Court in 1978 (Vermont Yankee V. NRDC) and no conditions applicable to Calvert Cliffs were upheld. Therefore, the provisions in Paragraph 2.G no longer apply and we request that this condition be deleted.

DETERMINATION OF SIGNIFICANT HAZARDS

This proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed amendment would not:

- (i) *involve a significant increase in the probability or consequences of an accident previously evaluated; or*

We are requesting a License Amendment which will result in reissuing the Unit 1 and Unit 2 Operating Licenses in a clean, consistent format. All past handwritten and "pasted-up" changes will be deleted or incorporated as appropriate, and all license conditions that have been completed to the satisfaction of the NRC will be removed.

These proposed changes are editorial and administrative and do not constitute a substantive change to the Operating Licenses. Therefore, the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (ii) *create the possibility of a new or different type of accident from any accident previously evaluated; or*

The proposed changes do not modify the plant's configuration or operation as they are editorial and administrative. As a result, no new accident initiators are introduced. Therefore, the changes do not create the possibility of a new or different type of accident from any accident previously evaluated.

- (iii) *involve a significant reduction in a margin of safety.*

As the proposed changes are editorial and administrative and do not constitute a substantive change to the Operating Licenses, the margin of safety is not affected.

ENVIRONMENTAL ASSESSMENT

The proposed amendments relate to changes in record keeping, reporting, or administrative procedures or requirements. We have determined that the proposed amendment involves no significant hazards consideration, and that operation with the proposed amendment would result in no significant change in the types, or significant increases in the amounts, of any effluents that may be released offsite, and in no significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR Part 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed amendment.

SCHEDULE

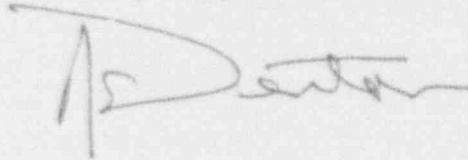
These changes are requested to be approved and issued by September 1, 1993. However, issuance of these amendments is not currently identified as having an impact on outage completion or continued plant operation.

SAFETY COMMITTEE REVIEW

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

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

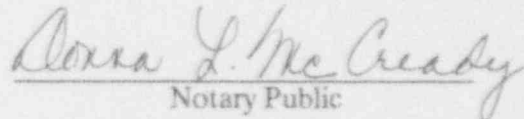
Very truly yours,



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

I hereby certify that on the 1st day of April, 1993, before me, the subscriber, a Notary Public of the State of Maryland in and for Calvert County, personally appeared Robert E. Denton, 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 response 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 response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:


Notary Public

My Commission Expires:

January 1, 1994
Date

RED/TWG/twg/dlm

Attachments: (1) Unit 1 Facility Operating License No. DPR-53 Revised Pages
(2) Unit 2 Facility Operating License No. DPR-69 Revised Pages

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC