



1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

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VICE PRESIDENT  
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August 27, 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; Removal of Component Lists from Technical Specifications per Generic Letter 91-08

REFERENCE: (a) Generic Letter 91-08, "Removal of Component Lists From Technical Specifications," dated May 6, 1991

Gentlemen:

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

#### DESCRIPTION

The proposed amendment would revise the Technical Specifications for both Units 1 and 2 to remove the list of containment isolation valves from the Technical Specifications. This line-item Technical Specification improvement was suggested in Generic Letter 91-08, "Removal of Component Lists From Technical Specifications," (Reference a) and is based on the experience of both the Nuclear Regulatory Commission and industry that many otherwise unnecessary license amendments were required to simply revise component lists. The guidance provided in the generic letter gave an acceptable alternative to identifying every component by its plant identification number as it is currently listed in the Technical Specification table. The removal of the containment isolation valves list does not change the technical specification requirements. A description of the applicable valves would replace the list of valves.

#### BACKGROUND

The Nuclear Regulatory Commission provided guidance for requesting an amendment to remove component lists from Technical Specifications in Generic Letter 91-08, "Removal of Component Lists from Technical Specifications." The guidance stated that an acceptable alternative to

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identifying every component by its plant identification number is to incorporate the list into plant procedures that are subject to the control provisions for plant procedures in the Technical Specification Administrative Controls Section. Removing the containment isolation valves list from the Technical Specifications permits administrative control of changes to the list without processing a license amendment. Any change to the list contained in plant procedures is subject to the requirements specified in the Administrative Controls Section of the Technical Specifications. Therefore, the change control provisions of the Technical Specifications provide an adequate means to control changes to the containment isolation valves list without including the list in the Technical Specifications.

#### REQUESTED CHANGE

Change Specifications 1.8.1.b, 3.6.1.1, 4.6.1.1.a, 3.6.4.1, 4.6.4.1.1, 4.6.4.1.2, 4.6.4.1.3 and 4.9.9 of the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal. Bases revisions are also included to support the requested changes to the Technical Specifications.

#### SAFETY ANALYSES / JUSTIFICATION

The containment isolation valves provide a means to isolate the containment following an accident. The removal of the containment isolation valves list from the Technical Specifications will not affect the safety function of these valves. The proposed changes will not alter the existing Technical Specification requirements. The list of containment isolation valves is moved from the Technical Specifications to plant procedures as stated in Generic Letter 91-08. Changes to this list are subject to the control provisions for plant procedures in the Technical Specification Administrative Controls Section. Removing the containment isolation valves list from the Technical Specifications allows changes to this list without a license amendment. The change control provisions for procedures, in accordance with the 10 CFR 50.59 process, provide adequate means to control changes to this list.

#### 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 proposed change to remove the containment isolation valves list from the Technical Specification will not change the technical requirements for these valves. This change will not affect the function of the containment isolation valves or change the operability requirements for the containment isolation valves. The proposed change will not change any accident initiators or the consequences of any analyzed accident. Therefore, the proposed change does 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 proposed change to remove the list of containment isolation valves from the Technical Specifications does not change the function of the containment isolation valves. The proposed change does not represent a change in the configuration or operation of the plant. No new hardware is being added to the plant as part of the proposed change. The Technical Specification requirements for the containment isolation valves will remain the same. Therefore, the proposed change does 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 proposed change will not affect the function of the containment isolation valves. Removing the containment isolation valves list will not alter the Technical Specification requirements on the valves. The change control provisions for plant procedures in the Technical Specification Administrative Controls Section are adequate to control revisions to the containment isolation valve list. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

#### DETERMINATION OF ENVIRONMENTAL IMPACT

The proposed amendment does not change any requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20. We have determined that the proposed amendment would result in 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, no environmental impact statement or environmental assessment is needed in connection with the approval of this proposed amendment.

#### SCHEDULE

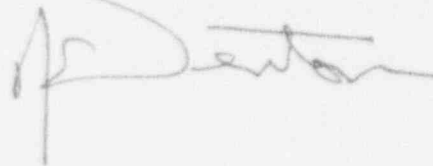
This change is requested to be approved and issued by March 1, 1994. However, issuance of this amendment is not currently identified as impacting outage completion or continued plant operation.

#### 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. They have concluded that implementing 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 27 day of August, 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:

February 2, 1994  
Date

RED/DJM/djm/dlm

Attachments: (1) Unit 1 Technical Specification Revised Pages  
(2) Unit 2 Technical Specification Revised Pages

cc: D. A. Brune, Esquire  
J. L. Silberg, Esquire  
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