



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

GEORGE C. CREEL
VICE PRESIDENT
NUCLEAR ENERGY
(301) 260-4455

August 28, 1990

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 License Amendment

REFERENCE: (a) Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals (Generic Letter 89-14), dated August 21, 1989

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.

CHANGE (BG&E FCR 90-103)

Change pages 3/4 0-2, B 3/4 0-3 and B 3/4 0-3a of the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal.

The proposed change would revise Technical Specification Surveillance Requirement 4.0.2 by deleting the requirement that the combined time interval for any three consecutive surveillance intervals is not to exceed 3.25 times the specified surveillance interval. The proposed change is based on the guidance of NRC Generic Letter 89-14, "Line-Item Improvements in Technical Specification - Removal of the 3.25 Limit on Extending Surveillance Intervals," [Reference (a)].

Baltimore Gas & Electric requests approval of the proposed amendment by January 15, 1991. While the proposed change is not required to address an immediate safety concern, we concur with Generic Letter 89-14 in that removal of the 3.25 limit will result in a safety benefit by providing for flexibility that would allow surveillance activities to be scheduled at times when plant conditions are more conducive to the safe conduct of a surveillance. Additionally, removal of the limit reduces the potential for unnecessary forced shutdowns to perform surveillance activities.

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DISCUSSION

On August 21, 1989, the NRC issued Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals." In this letter, the NRC staff noted that they have routinely granted requests for one-time exceptions to the 3.25 limit to accommodate variations in the length of a fuel cycle. While the 25% allowance is usually sufficient to accommodate variations in cycle length, the more common occurrence has been to encounter the 3.25 limit on the combined time interval for three consecutive surveillances. The basis for these exceptions was that the risk to safety due to the extension of these surveillances was low in contrast to the alternative of a forced shutdown to perform the surveillances. Furthermore, the NRC staff concluded that the elimination of this limit for surveillances that are performed on a routine basis during plant operation would also result in a significant safety benefit.

Calvert Cliffs currently operates on a 24-month fuel cycle. Some surveillances have a frequency of once per 18 months and are not associated with refueling outages. A statement will be added to the appropriate administrative procedures to ensure that the 25% allowance is not abused for these surveillances.

We concur with the NRC's finding that approval of this request will:

1. Facilitate scheduling of surveillance activities and allow surveillances to be postponed when plant conditions are less conducive to the safe conduct of a surveillance;
2. Reduce the potential for unnecessary forced shutdowns to perform surveillance activities;
3. Eliminate the administrative burden associated with tracking the use of the 25% allowance to ensure compliance with the 3.25 limit; and
4. Minimize the need for license amendments to extend surveillance intervals.

In summary, the flexibility to schedule surveillances so that conditions less suitable for performing these surveillances can be avoided outweighs any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. We, therefore, conclude that removal of the 3.25 limit for surveillances is justified. In addition, we proposed a change to the Bases for Technical Specification 4.0.2 to be consistent with the recommendations of Generic Letter 89-14.

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:

The surveillance intervals will continue to be constrained by the 25% limit of Technical Specification 4.0.2. The 3.25 surveillance interval provision was not considered in any safety analyses. Any risk associated with exceeding the 3.25 limit is outweighed by the risk associated with a forced shutdown to perform surveillances which would normally be performed during a refueling outage. In addition, for those surveillances which are routinely performed during plant operation, the flexibility to schedule surveillances to avoid plant conditions which are less conducive to surveillances represents a positive safety benefit. Therefore, the proposed change does 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:

The proposed change would not result in any physical alteration to any plant system, nor would there be a change in the method in which any safety-related system performs its function. The change would not result in any equipment being operated in a manner different than that in which it was designed to be operated. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

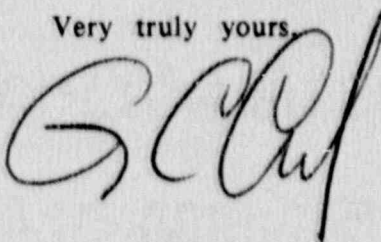
- (iii) Involve a significant reduction in a margin of safety:

Deletion of the 3.25 limit will not significantly affect the performance of equipment required to maintain the margin of safety as defined in the Technical Specification Bases and the safety analysis report. Rather, it will reduce the potential for interrupting normal plant operation due to surveillance scheduling. Surveillance intervals will continue to be constrained by the 1.25 limit. The added flexibility in scheduling surveillances afforded by deletion of the 3.25 limit should have a positive safety benefit by allowing surveillances to be performed under appropriate plant conditions. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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,



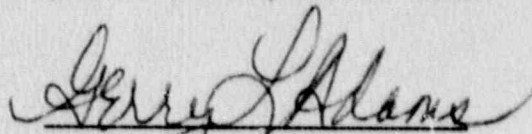
STATE OF MARYLAND

County of Calvert

TO WIT :

I hereby certify that on the 28th day of August, 19 90, before me, the subscriber, a Notary Public of the State of Maryland in and for St. Marys 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 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:

1 August 1990
Date

GCC/BSM/dlm

Attachments

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
L. E. Nicholson, NRC
R. I. McLean, DNR