



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

JOSEPH A. TIERNAN  
MANAGER  
NUCLEAR POWER DEPARTMENT

April 23, 1982

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



ATTENTION: Mr. Robert A. Clark, Chief  
Operating Reactors Branch #3  
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2, Docket Nos. 50-317 & 50-318  
Radiological Effluent Technical Specifications (RETS)

REFERENCES: (a) NRC letter dated 11/15/78, from B. K. Grimes to All PWR Licensees, 10 CFR 50, Appendix I  
(b) NRC letter dated 1/18/79, from B. K. Grimes to All Power Reactor Licensees, Offsite Dose Computational Manual  
(c) BG&E letter dated 3/15/79, from A. E. Lundvall, Jr. to Harold R. Denton, 10 CFR 50, Appendix I  
(d) NRC letter dated 4/6/82, from David H. Jaffe to Baltimore Gas and Electric Company, Summary of a Meeting with BG&E to Discuss the Radiological Effluent Technical Specifications

Gentlemen:

Submitted for your review is a working copy of Baltimore Gas and Electric Company's proposed Technical Specifications regarding radiological effluents. Also enclosed is an outline of the proposed Calvert Cliffs plant procedures for implementation of our augmented Radiological Effluent program. These documents are submitted in accordance with our agreement at the March 24, 1982, meeting, described in reference (d).

The Baltimore Gas and Electric Company also takes this opportunity to clarify its position on the RETS issue. Our major objection to the RETS program as proposed by the Nuclear Regulatory Commission is the expenditure of additional resources without a commensurate return in the level of safety. We are confident that our proposed RETS program will minimize, although it will not eliminate, the need for additional resource expenditure. Further, our program will allow for the more appropriate use of available resources with a resultant increase in the level of safety. The point concerning the appropriate use of available resources can be extended to include the dilutive effects of additional Technical Specifications. As a result of additional Technical Specifications,

8204270354

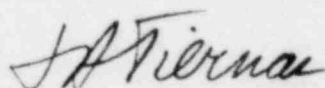
C002  
B.1

Mr. Robert A. Clark  
April 23, 1982  
Page 2

the efforts of operating personnel to focus on Technical Specifications more directly related to reactor operation are impeded and the level of safety may be reduced.

We are looking forward to resolution of the RETS issue. Should you have questions or comments regarding this matter, we would be pleased to discuss them with you.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. A. Tiernan".

Manager - Nuclear Power

JAT/DWL/gla

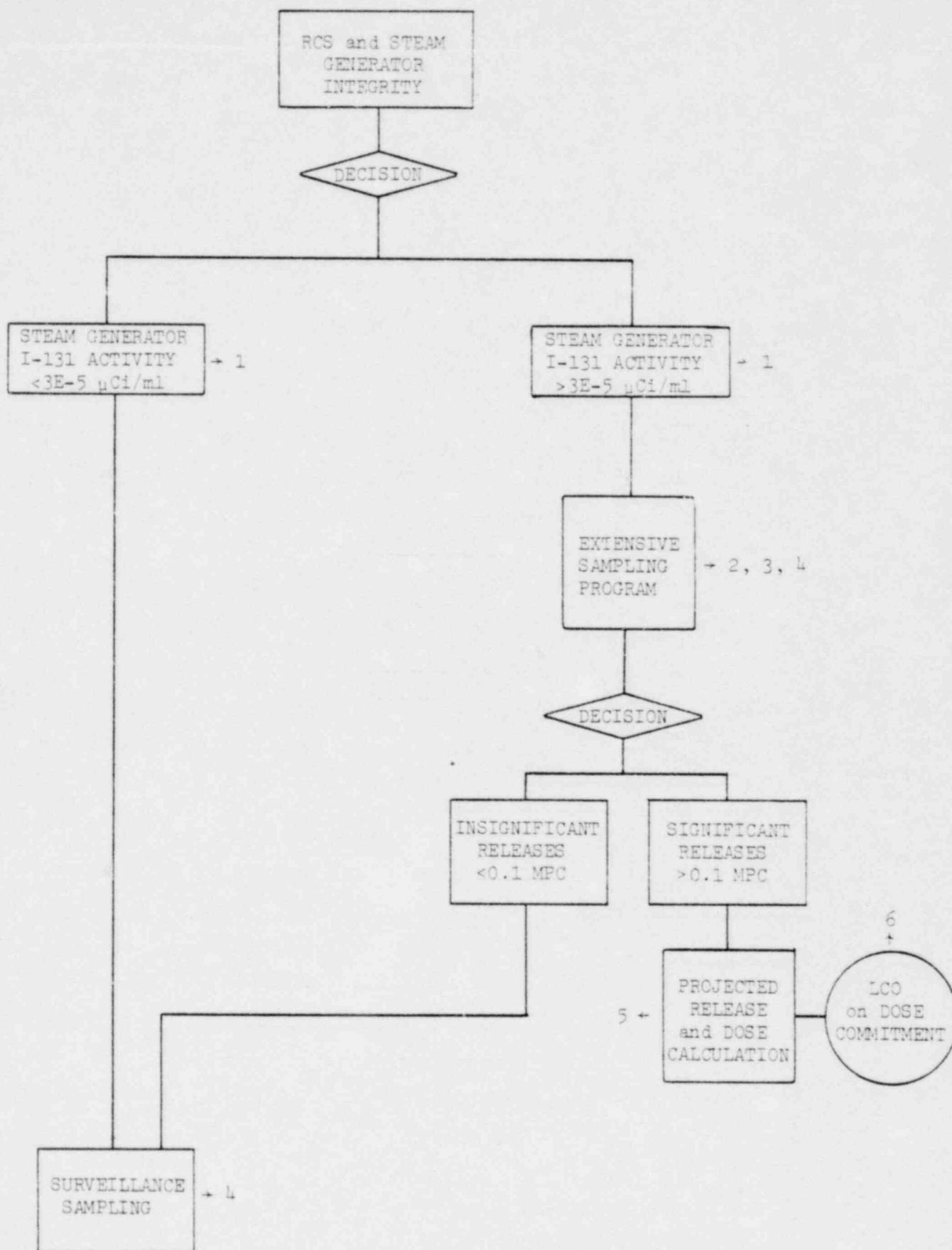
Attachments

cc: J. A. Biddison, Esquire  
G. F. Trowbridge, Esquire  
D. H. Jaffe, NRC  
R. E. Architzel, NRC

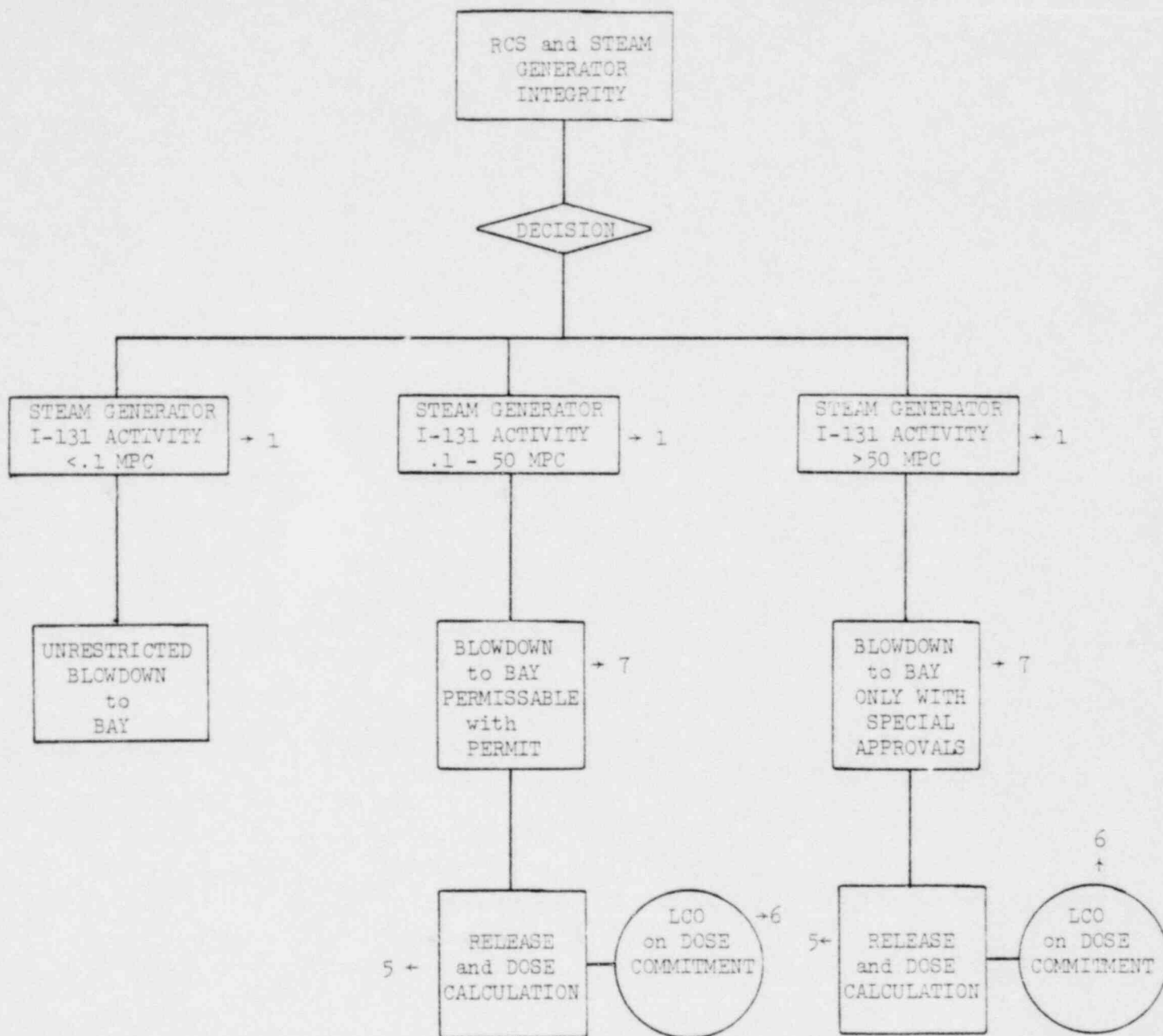
**CALVERT CLIFFS NUCLEAR POWER PLANT**  
**RADIOLOGICAL EFFLUENT IMPLEMENTING PROCEDURES**

1. RCP 1-210 Specifications and Surveillance of Steam Generators
2. RCP 1-211 Specifications and Surveillance of Condensate, Feedwater, and Main Steam Systems
3. RCP 1-213 Specifications and Surveillance - Neutralizing Tank
4. RCP 1-219 Plant Unmonitored Effluent Activity Surveillance Program
5. RCP 1-606 Determination of Dose Commitment for Radioactive Liquid Effluent
6. RCP 1-206 Specifications and Surveillance Requirements for Radioactive Liquid Releases
7. RCP 1-601 Radioactive Liquid Waste Permits
8. RCP 1-202 Specifications and Surveillance of Reactor Coolant System
9. RCP 1-607 Radioactive Liquid Waste Processing
10. RCP 1-608 Surveillance of Continuous Radioactive Gaseous Discharges
11. RCP 1-609 Determination of Dose Commitment for Radioactive Gaseous Effluents
12. RCP 1-207 Specifications and Surveillance Requirements for Radioactive Gaseous Releases
13. RCP 1-221 Specifications and Surveillances for Explosive Gas Mixtures
14. RCP 1-604 Radioactive Gaseous Waste Permits

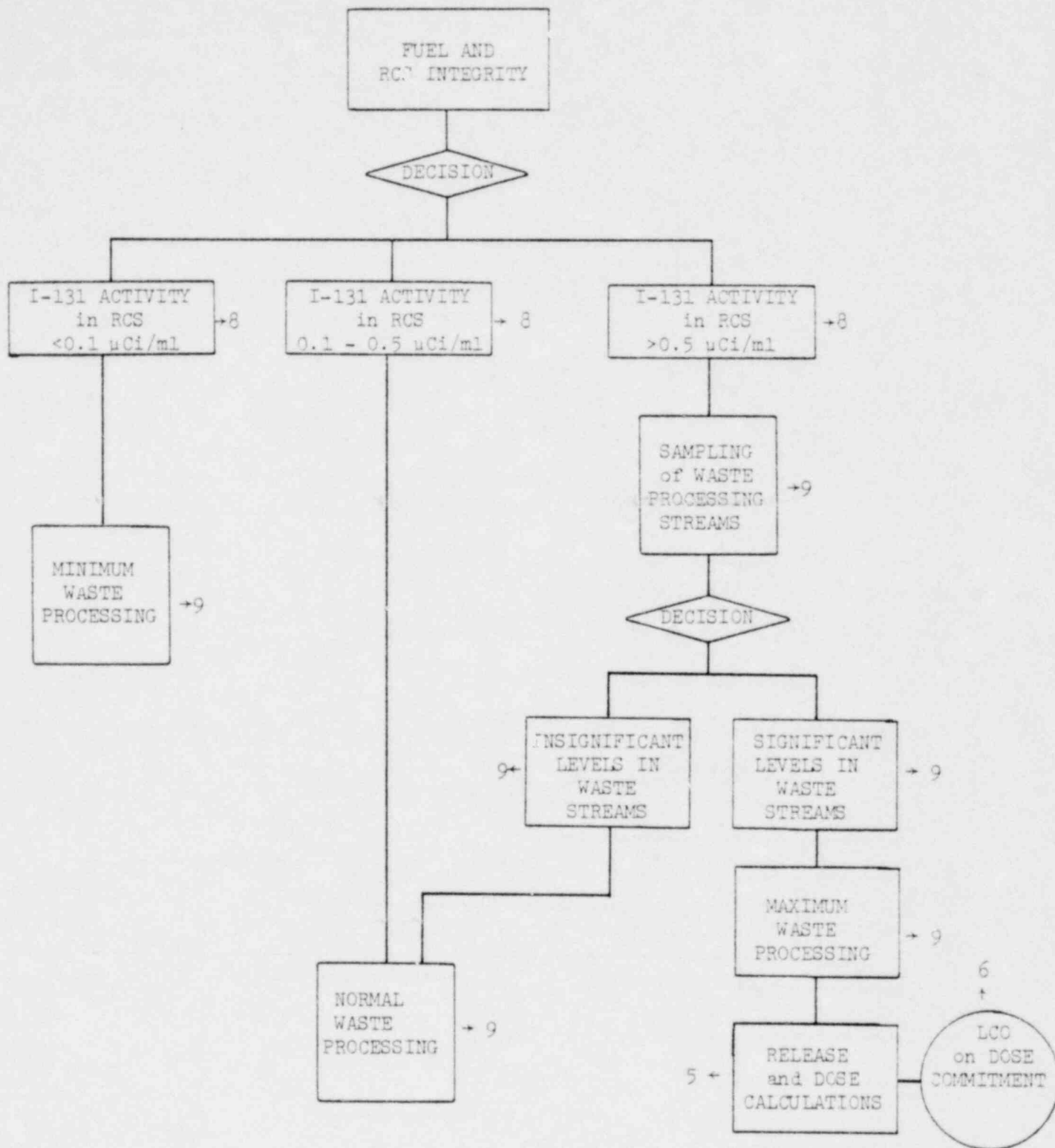
The numbers (1-14) on the attached figures indicate where the above procedures are applicable in the augmented Baltimore Gas and Electric Company's Radiological Effluent program.



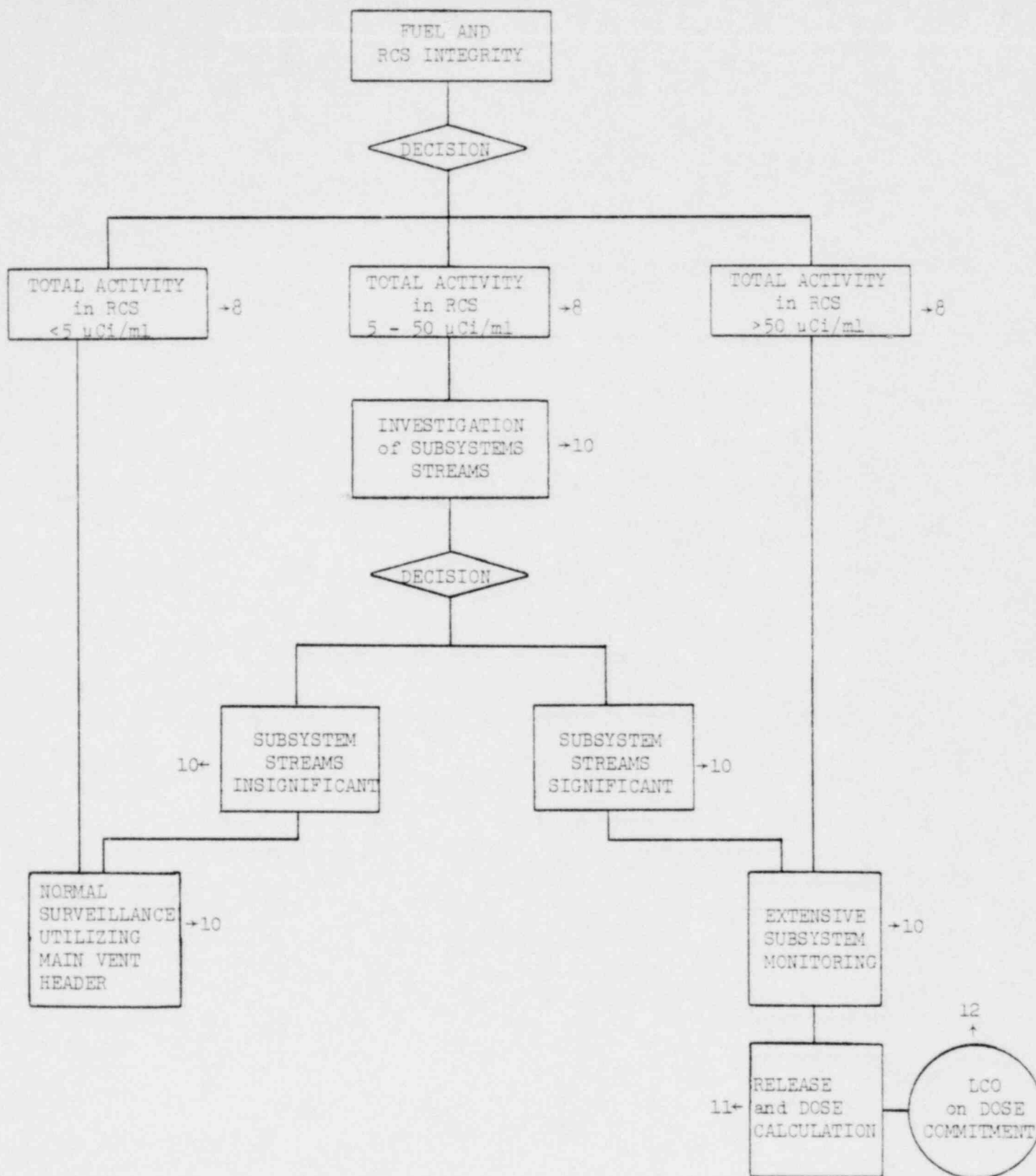
UNMONITORED LIQUID RELEASES - BG&E CONTROLLING PROCEDURES  
Figure 1



STEAM GENERATOR BLOWDOWN - BG&E CONTROLLING PROCEDURES  
Figure 2

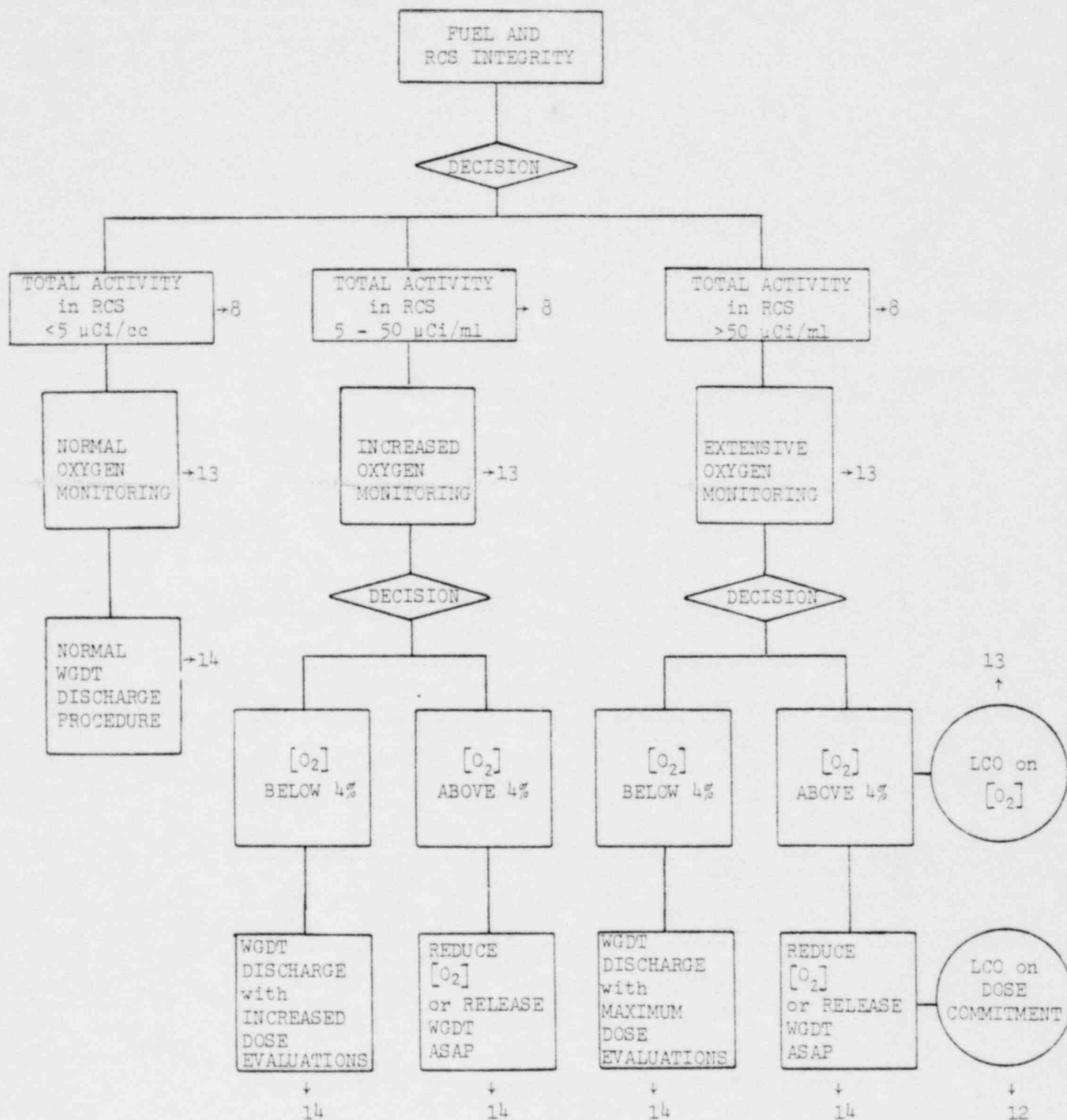


WASTE PROCESSING SYSTEM - BG&E CONTROLLING PROCEDURES  
Figure 3



CONTINUOUS GAS DISCHARGES - BG&E CONTROLLING PROCEDURES  
Figure 4





WASTE GAS DECAY TANK DISCHARGES - BG&E CONTROLLING PROCEDURES  
Figure 5