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August 4, 1994

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: Relocation of Seismic Monitoring Requirements

- REFERENCES:
- (a) The Nuclear Regulatory Commission's Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors, July 16, 1993
 - (b) NUREG-1432, Standard Technical Specifications for Combustion Engineering Plants, September 28, 1992

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

DESCRIPTION

The proposed amendment will eliminate Technical Specification 3/4.3.3.3, which gives requirements for seismic monitoring instrumentation, and relocate the requirements for operation and testing of the seismic monitoring instrumentation to the Calvert Cliffs Nuclear Power Plant Updated Final Safety Analysis Report (UFSAR) and plant procedures. The UFSAR change will be included in the next regular UFSAR update.

The Commission's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (Reference a) contains four criteria which can be used to determine which constraints on the design and operation of nuclear power plants are appropriate for inclusion in the plant's Technical Specifications. The Final Policy Statement also encourages licensees to request changes in their Technical Specifications to implement the policy. This seismic monitoring system does not meet any of the four criteria of the Final Policy Statement and, consequently, was not included in NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants" (Reference b).

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BACKGROUND

The seismic monitoring instrumentation at Calvert Cliffs is non-safety-related and consists of strong motion, tri-axial transducers that monitor the magnitude of seismic events and allow evaluation of the response of selected Class 1 structures. A multi-channel recording and playback station in the Control Room provides time-history records to evaluate the frequency response of the structures. A strip chart recorder is used to indicate if predetermined seismic acceleration values have been exceeded. Technical Specification 3/4.3.3.3 describes what seismic instruments are to be operable, actions to take in the event they are not operable, and periodic testing requirements.

As described below, the seismic monitoring system does not meet any of the four criteria in Reference (a) which can be used to determine which constraints on the design and operation of nuclear power plants are appropriate for inclusion in the plant's Technical Specifications.

Criterion 1 states, "Installed instrumentation that is used to detect and indicate, in the control room, a significant abnormal degradation of the reactor coolant system boundary."

The seismic monitoring system is not used for, nor is it capable of, detecting a significant degradation in the Reactor Coolant System boundary.

Criterion 2 states, "A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient Analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier."

The seismic monitoring system does not monitor any process variables used to verify that the assumed initial conditions of a Design Basis Accident or Transient Analysis are met. The system is also not a design feature or operating restriction that is an initial condition of a Design Basis Accident or Transient Analysis.

Criterion 3 states, "A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier."

The seismic monitoring system does not act to mitigate a Design Basis Accident or Transient.

Criterion 4 states, "A structure, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety."

The seismic monitoring system is not included in the list of Criterion 4 structures, systems or components included in Reference (a), and operating experience has not shown the seismic monitoring system to have a significant impact on public health and safety.

Therefore, we have concluded that the requirements on the seismic monitoring system are not constraints on design and operation which belong in the Technical Specifications. This same conclusion was reached by the NRC Staff when preparing NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants," Reference (b), which does not include Technical Specifications for the seismic monitoring system.

REQUESTED CHANGE

Revise the Calvert Cliffs Units 1 and 2 Technical Specifications as shown on the marked-up pages attached to this transmittal, removing Technical Specification 3/4.3.3.3. Associated Technical Specifications 6.9.2.b and d (Special Reports) and Bases 3/4.3.3.3 will be deleted. The final Technical Specification pages will be renumbered to accommodate deleted pages.

SAFETY ANALYSIS

The seismic monitoring system measures the seismic response of selected Class 1 structures, provides time-history records of seismic events, and would indicate if predetermined seismic acceleration values had been exceeded. Should a seismic event occur, the seismic monitoring system recordings would be used in determining an appropriate response. The data gathered by the seismic monitoring system could be used in engineering evaluations performed following a seismic event to determine the effect on plant structures. The plant is designed to withstand the loads imposed by the maximum hypothetical accident and the maximum seismic disturbance without loss of functions required for reactor shutdown and emergency core cooling. However, the seismic monitoring system is not credited in any accident analyses and is not used in any emergency operating procedure.

Relocating the operation and testing requirements for the seismic monitoring system from the Technical Specifications to the UFSAR and plant procedures will not affect seismic monitoring system requirements. The list of instruments, sensor locations and measurement ranges in Technical Specification Table 3.3-7 will be incorporated into the UFSAR. Tests which currently satisfy the surveillance requirements of Technical Specifications 4.3.3.3.1, Table 4.3-4, and 4.3.3.3.2 will be incorporated into plant procedures. If future proposed changes to the seismic monitoring system requirements did not meet the requirements for licensee implementation under 10 CFR 50.59, they would have to be approved by license amendment.

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 amendments:

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

The seismic monitoring system is used to measure the seismic response of selected Class 1 structures, provide time-history records of seismic events, and would indicate if predetermined seismic acceleration values had been exceeded. The seismic monitoring system itself has no safety function. The system measures values which are used after the fact to assess the intensity of an earthquake.

The proposed change will relocate requirements regarding the operability and testing of the seismic monitors from the Technical Specifications to the UFSAR and plant procedures. This will allow changes to the requirements to be made without Commission approval as long as the changes meet the criteria of 10 CFR 50.59. Associated Technical Specification Special Report requirements and Bases will be deleted. Changes to the seismic monitoring system requirements which do not meet the criteria of 10 CFR 50.59 must be approved by the Commission by license amendment.

The seismic monitoring system is not an initiator and does not act to minimize the consequences of any accident previously evaluated. 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 relocation of seismic monitor requirements from the Technical Specifications to the UFSAR and plant procedures does not represent a change in the configuration or operation of the plant. The seismic monitoring system will continue to be controlled under 10 CFR 50.59. Associated Technical Specification Special Report requirements and Bases will be deleted. The proposed change will not add any new hardware and will not introduce any new accident initiators. Therefore, the proposed change does not create the possibility of a new or different type of accident from any accident previously evaluated.

3. *Does operation of the facility in accordance with the proposed amendment involve a significant reduction in a margin of safety?*

The seismic monitoring system is used to measure the response of selected Class 1 structures to seismic events. The plant is designed to withstand the loads imposed by the maximum hypothetical accident and the design basis seismic disturbance without loss of functions required for reactor shutdown and emergency core cooling. As a consequence, the seismic monitoring system makes no contribution to the margin of safety, and neither do the associated special reports. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

ENVIRONMENTAL ASSESSMENT

The proposed amendment changes requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes to an inspection or surveillance requirement. 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 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

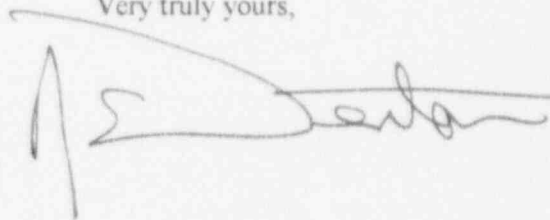
This change is requested to be approved and issued by February 1, 1995. However, issuance of this amendment is not currently identified as having an impact on outage completion or continued plant operation.

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 Offsite Safety Review Committee. 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 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 4th day of August, 1994, 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, 1998
Date

RED/JV/dlm

Attachments: (1) Unit 1 Marked-Up Technical Specification Pages
(2) Unit 2 Marked-Up Technical Specification Pages

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cc:

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