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

April 30, 1991

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; One-time Scheduler Extension of a
Periodic Report

Gentlemen:

Baltimore Gas & Electric Company hereby requests an Amendment to its Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Units 1 & 2, respectively, with the submittal of the following proposed change to the Technical Specifications.

BACKGROUND/DESCRIPTION OF CHANGE

Technical Specification 6.9.1.8. addresses a semiannual radioactive effluent release report. This report is due within 60 days after January 1 and July 1 of each year, except that for Strontium 89 and Strontium 90, analyses results may be submitted in a supplementary report within 120 days after January 1 and July 1 of each year.

The first Strontium report for 1991 is due April 30, 1991. Due to a delay in transporting the samples off site to the analysis lab, the report cannot be submitted on time. Therefore, a one-time scheduler extension for 60 days for the first Strontium report for 1991 is requested, such that the report would be due June 29, 1991.

JUSTIFICATION

The semiannual radioactive effluent release report of Technical Specification 6.9.1.8 covers liquid effluents and gaseous effluents. The radioisotopes involved include fission product isotopes and corrosion product isotopes. The samples measured give an after-the-fact confirmation that the releases that occurred during the timeframe covered were within limits. Strontium 89 and Strontium 90 are two of those fission product isotopes.

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The reasons for the existing allowance in Technical Specification 6.9.1.8 for an additional 60 days to submit a supplemental report containing the Strontium 89 and Strontium 90 analyses results is that these analyses take much more time to complete than those for other isotopes, and these analyses are best performed off site. The 60-day extension is normally necessary to ensure that high quality analyses and results are obtained.

Historical results for Strontium 89 and Strontium 90 have been very low, with airborne results often less than the minimum detectable activity. The power history for the two units during the timeframe covered was low. The results for the other isotopes were low. Therefore, strontium results from the operating period in question are also expected to be low.

Consequently, an extension of the due date for the strontium results report from April 30 to June 29, 1991 will not have adverse affects on safety.

Efforts are in progress to determine the reasons for the delay in transporting the samples off site and any necessary actions to prevent recurrence.

REQUESTED CHANGE

Change page 6-17 of the Unit 1 and Unit 2 Technical Specifications, as shown on the marked up copies of those pages, attached to this letter.

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.*

Strontium releases are not in any way related to initiators, and therefore probabilities, of previously analyzed accidents. As far as the consequences of previously analyzed accidents, data concerning the releases of strontium would be an indication of their potential consequences but not a contributor to any increase in consequences. These strontium analyses are performed to confirm that the results of releases are within limits.

Based on the low results of other isotopes for the operating period, the strontium levels should also be low. Therefore, the proposed 60-day extension of the submittal due date for the strontium data required by Technical Specification 6.9.1.8 would 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 60-day extension of the submittal due date for the strontium data will not physically change the plant or the way in which the plant is operated. Therefore,

the proposed change would 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.*

The margin of safety in the area of radioactive effluents is primarily achieved through the limits placed on the quantities and activity levels of effluent releases prior to release. The strontium analyses in question are an after-the-fact verification that no abnormal levels of activity exist.

Therefore, the proposed 60-day extension of the submittal due date for the strontium data would not involve a significant reduction in a margin of safety.

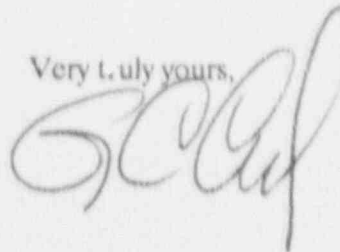
SCHEDULE

This amendment is requested to be processed as soon as practicable.

SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications 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.

Very truly yours,



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

I hereby certify that on the 30th day of April, 1991, before me, the subscriber, a Notary Public of the State of Maryland in and for Calvert 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 information 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 information on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:

Robin C. Johnson
Notary Public

My Commission Expires:

January 31, 1995
Date

GCC/DLS/dls/dlm
Attachment

Document Control Desk

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cc: D. A. Brune, Esquire
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