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

May 24, 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
Requests for Relief from ASME Section XI Requirements
(TAC Nos. 76786 & 76787)

REFERENCE: (a) Letter to Mr. G. C. Creel (BG&E) from Mr. Robert A. Capra (NRC), Second Ten-Year Interval Inservice Testing Program - Calvert Cliffs Nuclear Power Plant, Units 1 and 2, dated September 20, 1990

Gentlemen:

Reference (a) forwarded the Nuclear Regulatory Commission (NRC) Safety Evaluation related to the inservice testing (IST) program and requests for relief for the Calvert Cliffs second ten-year inspection interval. We wish to further address two relief requests from Reference (a).

Relief request 3.1.1.1 of Enclosure 2 to Reference (a) corresponds to Relief Request No. 3 from our October 18, 1988 submittal of our proposed IST program. Attachment (1) to this letter reiterates Relief Request No. 3 and contains more current information than that previously submitted. We request reconsideration of that request.

Relief request 4.3.1.1 of Enclosure 2 to Reference (a) corresponds to relief request RC-1 from our October 18, 1988 submittal of our proposed IST program. This relief request deals with stroking of Power Operated Relief Valves (PORVs).

We hereby withdraw relief request RC-1. Also, we commit to categorizing these valves as ASME Section XI Category B cold shutdown exercised valves and to performing all tests resulting from this categorization; however, the Reactor Coolant System pressure signal that actuates our PORVs is also the same signal that isolates our shutdown cooling system for overpressurization protection. Our Updated Final Safety Analysis Report presently requires two independent means to isolate the Shutdown Cooling System from the Reactor Coolant System. This means that certain conditions must be met when testing PORVs while shutdown cooling is in operation. An initial conservative analysis to allow PORV testing with shutdown cooling in operation shows that decay heat conditions will not be satisfactory for PORV testing until 31 days following shutdown. More detailed analyses are in progress to reduce that time interval. We anticipate results prior to the Unit 1 refueling outage, presently planned for the spring of 1992.

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Testing of PORVs is also the subject of NRC Generic Letter 90-06. Resolution of Generic Letter 90-06 is ongoing and will occur separately from resolution of this IST program item.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

GCC/DLS/bjd/dlm

Attachment: (1) Relief Request Number 3

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
J. H. Walter, PSC

ATTACHMENT (1)

RELIEF REQUEST NUMBER 3

Systems: Chemical and Volume Control (both Charging and Boric Acid), Low Pressure Safety Injection, High Pressure Safety Injection, Containment Spray, Salt Water Cooling, Component Cooling, Auxiliary Feedwater, Service Water

P&ID's: Various

Pumps: All Safety Related Pumps

Class: 2/3

Impractical Test Requirement: IWP-3100 requirement to measure bearing temperature.

Basis for Relief: The referenced code requires bearing temperature to be recorded annually. It has been demonstrated by experience that bearing temperature rise often occurs only minutes prior to bearing failure. Therefore, the detection of possible bearing failure by a yearly temperature measurement is extremely unlikely. It requires at least one half hour of pump operation to achieve stable bearing temperatures. The small probability of detecting bearing failure by annual temperature measurement does not justify the additional pump operating time required to obtain the measurements.

Prior to testing, the code acceptability of our current instrumentation would need to be reverified and then numerous procedures changes made to accomplish the subject testing. The cost of compliance is burdensome considering the testing does not yield any results of value.

In addition to vibration testing in accordance with Code requirements these pumps are part of the Calvert Cliffs Condition Monitoring Program. This program provides much more comprehensive information regarding pump conditions than annual bearing temperature measurements.

Alternative Testing: Vibration testing will be performed in accordance with ASME Section XI Code requirements.