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VICE PRESIDENT
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July 19, 1991

U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Generic Letter 89-19, Unresolved Safety Issue A-47

- REFERENCES:
- (a) Generic Letter 89-19, Request for Action Related to Unresolved Safety Issue A-47, "Safety Implication of Control Systems in LWR Nuclear Power Plants" Pursuant to 10 CFR 50.54(f)
 - (b) Letter from Mr. G. C. Creel (BG&E) to NRC Document Control Desk, dated March 19, 1990, Response to Generic Letter 89-19, Unresolved Safety Issue A-47
 - (c) Letter from Mr. J. J. Hutchinson, [Combustion Engineering Owners Group (CEOG)] to Mr. S. Newberry (NRC), dated October 31, 1990, NRC Generic Letter 89-19, CEOG Concerns Regarding Steam Generator Overfill Protection (SGOP)

Gentlemen:

In our March 19, 1990 response (Reference b) to the recommendation of Generic Letter 89-19 (Reference a), we stated that a steam generator feed pump trip would be installed in both Calvert Cliffs Units to provide a separate and independent steam generator overfill-protection system that would serve to mitigate main feedwater overfeed events.

Subsequent to that submittal, on November 20, 1990, members of the Combustion Engineering Owner's Group (CEOG) met with the NRC staff to discuss the Generic Letter's recommendation to install an automatic feedwater pump trip system. CEOG questioned the cost/benefit ratio associated with the recommended hardware change in light of recent data that indicated steam generator overfill to be a low risk event with no real safety significance (Reference c). The CEOG also questioned the lack of safety assessment regarding the negative impact of a spurious feedwater pump trip and loss of feedwater. The NRC staff stated that it would review and evaluate the information presented to them. The NRC staff also recommended that the implementation of any overfill protection system be placed on hold pending the completion of this evaluation.

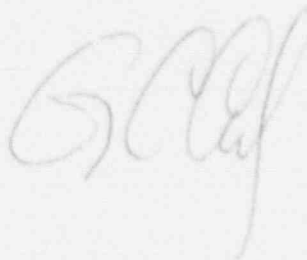
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This letter is to inform you that the implementation of this system at Calvert Cliffs is being held in abeyance until such time that the NRC staff completes the review of CEOG's concerns and communicates further instruction. Baltimore Gas and Electric Company will then reevaluate its position and take appropriate action. Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



GCC/GT/gt/dlm

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
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