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VICE PRESIDENT
NUCLEAR ENERGY
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July 2, 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
Revision to Technical Specification Bases

Gentlemen:

The Baltimore Gas and Electric Company hereby submits for your information and distribution the attached revision to the Bases for the Technical Specifications provided with Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 & 2, respectively.

Technical Specification 3/4.2.1 provides limiting conditions for operation and surveillance requirements for the linear heat rate. Surveillance Requirement 4.2.1.2 requires that linear heat rate be determined to be within its limits by continuously monitoring the core power distribution with either the excore detector monitoring system or with the incore detector monitoring system. Normally, the incore detectors are used via the plant computer to monitor linear heat rate directly. However, when the plant computer is not in service, the excore detectors are used in conjunction with the power ratio recorder (PRR) to monitor axial shape index (ASI) as a function of thermal power in order to assure operation within the limiting conditions for operation for linear heat rate.

There are six excore detector channels. Four safety channels (A, B, C, and D) provide inputs to the reactor protection system (RPS) and two control channels (X and Y) are part of the reactor regulating system. The X and Y control channels each have an upper and lower excore detector which provide input to the PRR. The PRR uses the difference between the upper and lower detector signals from the control channels to produce an ASI signal. However, the BASES for Specification 3/4.2.1 indicate that ASI is monitored "with the OPERABLE quadrant symmetric excore neutron flux detectors . . ." The quadrant symmetric excore detectors are safety channels A, B, C and D, and are not the control channel excore detectors used to monitor ASI.

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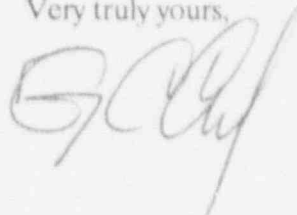
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Baltimore Gas and Electric has therefore revised page B3/4 2-1 of the Bases for the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal. These changes are consistent with the existing design basis for the facility as documented in Topical Report CEN-124(B)-P, Part 3, March 1980, "Statistical Combination of Uncertainties," which addresses this mode of operation in Section 2.4 and Appendix A. Use of this topical report is included in the Updated Final Safety Analysis Report (UFSAR), Section 3.5.3, and was approved in the NRC Safety Evaluation Reports (SER) for Calvert Cliffs Operating License Amendment Nos. 71 (Unit 1, SER Sections 5.4 and Appendix A, Section A.3.1) and 61 (Unit 2, SER Section 7.4).

As indicated above, these revisions for the Bases of the Technical Specifications correct discrepancies in the existing Bases Section. These revisions reflect the existing design basis for the facility as documented in the UFSAR and design modifications previously approved by the NRC Staff. Further, these revisions have been reviewed by our Plant Operations and Safety Review Committee and Off-Site Safety Review Committee, and they have concluded that implementation of these revisions 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 2nd day of July, 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:


Notary Public

My Commission Expires:

February 2, 1994
Date

GCC/ERG/erg/dlm

Attachment: Revised Technical Specification Bases Pages
Unit 1 - B3/4 2-1
Unit 2 - B3/4 2-1

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