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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

March 26, 1984

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Mr. James R. Miller, Chief
Operating Reactors Branch #3

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 2, Docket No. 50-318
Request for Amendment

- References:
- (1) BG&E letter from Mr. A. E. Lundvall Jr., to Mr. J. R. Miller, dated September 20, 1983, Request for Amendment.
 - (2) NRC letter from Mr. D. H. Jaffe to Mr. A. E. Lundvall, Jr., dated November 17, 1983, Amendment No. 88 and related Safety Evaluation.
 - (3) BG&E letter from Mr. A. E. Lundvall, Jr. to Mr. J. R. Miller, dated December 22, 1983, Request for Amendment.

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its Operating license No. DPR-69 for Calvert Cliffs Unit No. 2, with the submittal of the enclosed proposed changes to the Technical Specifications.

PROPOSED CHANGES

Change No. 1 (BG&E FCR 84-31)

Replace old pages 3/4 6-23 and 3/4 6-25 with marked-up pages, and add new Technical Specification 3/4.6.1.8 and 3/4.9.14 (Attachment 1). This proposed change will reflect the addition of a SIAS signal to Unit 2 containment hydrogen purge outlet valves MOV 6900 and 6901, and restrict their operation as done for the Unit 1 valves in References (1) and (2) until the NRC safety evaluation regarding operability during **MODES 1-4** is completed.

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Change No. 2 (BG&E FCR 84-31)

Concurrent with approval of the Unit 1 (Reference (3)) request for Technical Specification changes allowing operation of MOV 6900 and 6901, it is requested the following changes also be included:

Delete Technical Specification 3/4.6.1.8, included in Change No. 1 above, and replace page 3/4 6-25, and 3/4 6-23 with the attached marked-up pages deleting the footnotes of Table 3.6-1 referencing TS 3/4.6.1.8 and containment vent isolation valves (Attachment 2).

DISCUSSION AND DETERMINATION OF SIGNIFICANT HAZARDS

Reference (1) described our intentions to perform a physical modification to the Unit 1 hydrogen purge system outlet isolation valves that added a Safety Injection Actuation Signal (SIAS) closure feature to the motor operators of MOV 6900 and 6901. It also described the testing and administrative controls we were to perform on these valves. This modification and testing was subsequently performed during the 1983 Unit 1 refueling outage. The license amendment request of Reference (1) was granted by Reference (2). BG&E intends to perform the same modification and testing on Unit-2 MOV's 6900 and 6901 during the upcoming refueling outage, which is scheduled to begin in mid April 1984. Change No. 1 would accomplish the same function for Unit 2 as the changes approved for Unit 1 in Reference (2).

Reference (3) forwarded a safety analysis supporting proposed changes to the Technical Specifications that would allow operation of the subject valves during **MODES** 1 through 4. Change No. 2 of this letter would, therefore, allow operation of the Unit 2 valves for containment venting.

Because the Technical Specification changes requested in this letter are the same as those previously submitted for Unit 1, and because the systems and planned physical modifications are essentially the same, the safety analysis and determination of significant hazards submitted in Reference (3) for Unit 1 are also applicable to Unit 2. We find, therefore, these proposed changes do not involve a significant increase in the probability or consequences of accidents analyzed in the Updated Final Safety Analysis Report, nor do they create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve a significant reduction in the margin of safety as defined in the Technical Specification bases. This determination, as noted in Reference (3), is consistent with examples of license amendments not likely to involve significant hazards considerations as published in Federal Register Notice 14870.

Review and approval of Change No. 1 of this letter is requested prior to the end of the upcoming Unit 2 refueling outage, and subsequent review and approval of Change No. 2 is requested to be conducted concurrently with the Unit 1 request submitted in Reference (3).

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Change No. 3 (BG&E FCR 83-1083)

Remove existing page 3/4 3-38, Table 3.3-9 of Unit No. 2 Technical Specifications and replace with revised page 3/4 3-38, Attachment (3) to this transmittal.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed change is administrative in nature. Table 3.3-9 is being changed to reflect a Wide Range Neutron Flux Remote Shutdown Monitoring Instrumentation measurement range of 0.1 cps -200% instead of 0.1 cps -150%. Also, the Readout Location for this instrument is being changed from the Auxiliary Feedwater pump room instrumentation cabinet to panel 2C43 located in the 45 foot elevation switchgear room. These administrative changes are required to document facility changes related to Alternate Safety Shutdown requirements which are planned for the April 1984 Unit 2 Refueling Outage.

We have reviewed the proposed change against the requirements of 10 CFR 50.92 and have determined that the change involves no significant hazards considerations.

- (1) There is no significant reduction in the margin of safety as a result of the proposed change.
- (2) It will not result in any increase in the probability or consequences of any accident previously evaluated.
- (3) It will not create the possibility of a new or different kind of accident from any accident previously evaluated.

SAFETY COMMITTEE REVIEW

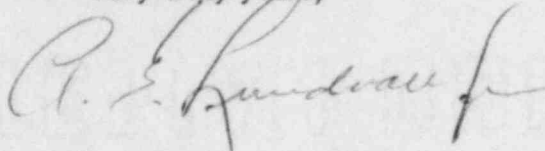
These proposed changes to the Technical Specifications and the determination of significant hazards have been reviewed by our Plant Operations and Off-Site Safety Review Committees, and they have concluded that implementation of these changes will not result in an undue risk to the health and safety of the public.

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FEE DETERMINATION

We have determined, pursuant to 10 CFR part 170 paragraph 170.22 that this Amendment consists of three Class I Amendments. Accordingly, we are including BG&E check number B391969 in the amount of \$1,200.00 to cover the fee for this request.

Very truly yours,



REL/JET/DSE/sjb

STATE OF MARYLAND :

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TO WIT:

CITY OF BALTIMORE :

Arthur E. Lundvall, Jr., being duly sworn 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:

Minnie L. Robinson
Notary Public

My Commission Expires

July 1, 1986

cc: J. A. Biddison, Jr., Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC
T. Magette, DNR