



Done

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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

September 14, 1984

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

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

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Primary Reactor Containment Testing
Request for Relief from 10 CFR 50 Appendix J Requirements Determined to be Impractical

Gentlemen:

In accordance with 10 CFR 50.12, we are requesting an exemption from certain requirements of 10 CFR 50.54(o) that have been determined to be impractical. As outlined in 10 CFR 50.12, the information concerning the exemption request is presented herein.

The requirements of 10 CFR 50 Appendix J III.D.1(a) specify "... a set of three tests shall be performed, at approximately equal intervals during each 10-year service period. The third test of each set shall be conducted when the plant is shutdown for the 10-year plant Inservice Inspections (ISI)." In addition to the Appendix J requirements, the Calvert Cliffs Unit 1 & 2 Technical Specifications specify the Type A tests must be performed every 40+10 months. If the third Integrated Leak Rate Test (ILRT) is performed at the scheduled 10-year ISI outage, the 40+10 month testing frequency will be exceeded. We request a permanent exemption from the requirement to conduct the third ILRT during the shutdown for the 10-year ISI outage, in that no 10-year ISI outage activity specifically alters containment integrity. We feel that the intent of the codes are satisfied by the 40+10 month frequency. Our scheduled refueling outages are indicated in the following table.

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CALVERT CLIFFS REFUELING OUTAGES

UNIT ONE

Spring 82*
Fall 83
Spring 85**
Fall 86***
Spring 88
Fall 89

UNIT TWO

Fall 82*
Spring 84
Fall 85**
Spring 87***
Fall 88
Spring 90

* Last completed ILRT
** Next scheduled ILRT
*** 10-year ISI outage

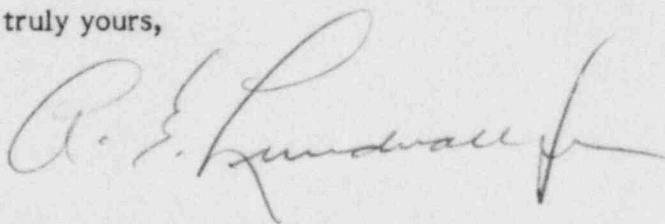
No other requirement of 10 CFR 50.54 or Appendix J will be affected by granting the exemption. Our previous Type A test performance dates and scheduled 10-year ISI outage make it impractical to perform the Type A test during the 10-year ISI outage. The third of the subject tests will be conducted to meet the 40+10 month frequency requirement. This test will occur during the outage prior to the 10-year ISI. Performing the next Type A test for Unit 1 and 2 during the 1985 Spring and Fall outages, respectively, will provide periodic assessment of Containment Integrity.

Granting the requested exemption will not give rise to a adverse impact on the environment. Performance of the Type A test will continue to ensure satisfactory containment performance. It is in the public benefit to grant the requested exemption as it ensures the safest and most economical testing schedule.

Pursuant to 10 CFR 170.21, Baltimore Gas & Electric Check No. B394034 in the amount of \$150 is remitted to cover the application fee for this request.

Should you any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,



AEL/OPB/gla

Attachment

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cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC