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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

April 26, 1985

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 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
Request for Amendment

- REFERENCES:
- (a) Letter from A. E. Lundvall, Jr., BG&E, to J. R. Miller, NRC, dated October 11, 1984, Request for Amendment
 - (b) Letter from A. E. Lundvall, Jr., BG&E, to J. R. Miller, NRC, dated September 14, 1984, Request for Exemption
 - (c) Letter from J. R. Miller, NRC, to A. E. Lundvall, Jr., BG&E, dated February 14, 1985, License Amendments 98 & 80
 - (d) I&E Inspection Report 50-317/83-31; 50-318/83-31
 - (e) NRC letter dated July 31, 1979, from R. W. Reid to A. E. Lundvall, Jr., Amendments 40 & 22
 - (f) NRC letter dated November 2, 1981, from D. H. Jaffe to A. E. Lundvall, Jr., Amendments 58 & 40

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its Operating License Nos. DPR-53 and DPR-69, for Calvert Cliffs Unit Nos. 1 & 2, respectively, with the submittal of the proposed changes to the Technical Specifications.

CHANGE NO. 1 (BG&E FCR 84-90)

Remove pages IV, 3/4 3-26, 28, and 47, and B 3/4 3-2 and B 3/4 3-3 of the Unit 1 and 2 Technical Specifications and replace with the marked-up pages attached to this transmittal.

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DISCUSSION

The proposed change relocates the requirements for the Wide Range Iodine and Particulate Samplers from Technical Specification 3.3.3.8 to Table 3.3-6. The present location of 3.3.3.8 was originally intended to match the proposed Radiological Effluent Technical Specification (RETS) for the Iodine and Particulate Samplers. The proposed location, Table 3.3-6, brings together the Wide Range Iodine and Particulate Samplers and the Wide Range Noble Gas Monitor.

The proposed RETS for the Iodine and Particulate Samplers address two systems: the Plant Main Vent Gas Monitor System and the Wide Range Effluent Gas Monitor System. Although each system has Iodine and Particulate Samplers that meet the requirements for RETS, only the Wide Range Samplers meet the requirements of NUREG-0737, Item II.F.1.

The proposed change would specifically require the operation and surveillance of the Wide Range Samplers. The Samplers also serve as a conditioning skid for the Wide Range Noble Gas Monitor and, therefore, are included in Table 3.3-6 with the Wide Range Noble Gas Monitor.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

This proposed change has been evaluated against the standards set forth in 10 CFR 50.92, and has been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed amendment would not:

- (i) Involve any increase in the probability of occurrence or consequences of an accident previously evaluated in the Updated Final Safety Analysis Report (FSAR).
- (ii) Create the possibility of a new or different type of accident from any accident previously evaluated.

The proposed administrative change will not result in a change to the equipment, operation, or surveillance to create the possibility of a new or different accident.

- (iii) Involve a significant decrease in the margin of safety.

The Wide Range Effluent Gas Monitor System is not in the Safety Analysis. But as an aid to assess core damage and offsite releases, the proposed change will not reduce the system's capability or reliability.

CHANGE NO. 2 (BG&E FCR 84-112; Supplement 1)

Remove existing page 3/4 6-2 of the Unit 1 & 2 Technical Specifications and replace with the marked-up page attached to this transmittal.

DISCUSSION

This change is being proposed to complete the action previously requested by references (a) and (b). Reference (c) provided a one-time exemption from the requirements of 10 CFR 50 Appendix J, to permit performing the third Integrated Leak Rate (Type "A") Test (ILRT) during a refueling outage prior to the 10-year Inservice Inspection (ISI) outage on Unit 1 & 2. This one time exemption permits BG&E to conduct the third ILRT for the current 10-year ISI interval during the earlier refueling outage, but does not address subsequent 10-year intervals.

Therefore, we are now requesting a permanent exemption from 10 CFR 50 Appendix J and a revision to Technical Specification 3/4.6.1.2 to eliminate the requirement to conduct the third Integrated Leak Rate Test during the shutdown for the 10-year ISI.

For your information, a schedule of our anticipated ILRTs is given below:

CALVERT CLIFFS REFUELING OUTAGES

ANTICIPATED SCHEDULE

<u>UNIT ONE</u>	<u>UNIT TWO</u>
Spring 1985	Fall 1985
Fall 1986*	Spring 1987**
Spring 1988**	Fall 1988
Fall 1989	Spring 1990
Spring 1991	Fall 1991
Fall 1992	Spring 1993
Spring 1994	Fall 1994
Fall 1995	Spring 1996
Spring 1997*	Fall 1997*
Fall 1998	Spring 1999
Spring 2000	Fall 2000

* 10-year ISI inspections (anticipated)

** The above schedule is based on an 18-month refueling schedule. If a 24-month fuel cycle were initiated during this outage, the remainder of the schedule would change.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

As we stated in reference (a), this proposed change to the Technical Specifications has been evaluated against the standards in 10 CFR 50.92. It has been determined that this constitutes an example of an amendment considered not likely to involve significant hazards considerations, in that operation of the facility in accordance with the proposed change would not:

- (i) involve any significant increase in the probability or consequences of any accident previously evaluated.

This is because the Type "A" ILRT test will continue to meet its intent with the 40 ± 10 month requirement in the Technical Specifications.

- (ii) create the possibility of a new or different type of accident from any previously evaluated.

This is because no actual system modifications or test methodology changes will result.

- (iii) involve any reduction in the margin of safety.

This is because the 40 ± 10 month interval will be maintained. In addition, the 10-year ISI outage activity does not specifically alter containment integrity.

CHANGE NO. 3 (BG&E FCR 85-18)

Remove existing pages 3/4 6-9 and B 3/4 6-2 of the Unit 1 Technical Specifications and replace with the new marked-up pages. In addition, remove existing pages 3/4 6-8 and B 3/4 6-2 of the Unit 2 Technical Specifications and replace with the new marked-up pages.

DISCUSSION

This proposed change to the Technical Specifications provides clarification of the Surveillance Requirements for containment tendon end anchorages and adjacent concrete surfaces. Two types of concrete surveillance are performed at Calvert Cliffs. One surveillance monitors concrete crack observation areas during the Type "A" containment leakage tests. These areas were originally mapped during the containment Structural Integrity Test. The second surveillance consists of a visual examination of containment tendon end anchorages selected for the tendon tests of Technical Specification Surveillance Requirement 4.6.1.6.1.

Regulatory Guide 1.35, Revision 2, "Inservice Inspection of Ungrouted Tendons in Prestressed Concrete Containment Structures," provides selection criteria for the tendon tests of Technical Specification Surveillance Requirement 4.6.1.6.1 and is presently the sole document referred to in the bases. The Regulatory Guide is a suitable reference for tendon inspections, but does not accurately outline the concrete crack observation program that was originally instituted at Calvert Cliffs in the preservice Structural Integrity Test. Therefore, the Structural Integrity Test is being added as a reference in the bases. Also, the ambiguity regarding the number of end anchorages and adjacent concrete surfaces that are inspected during each tendon surveillance has been clarified by referencing Technical Specification Surveillance Requirement 4.6.1.6.1 to specify

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tendons sampled for inspection. These changes differentiate between concrete crack mapping performed during the Type "A" Integrated Leak Rate Test and visual inspections accomplished during the tendon structural integrity surveillance.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

No previously analyzed accident in the Updated Final Safety Analysis Report is affected by this proposed change, since it only provides a clarification of existing Surveillance Requirements and associated bases. No new accidents previously unanalyzed will be created by this proposed change, since no modifications to the intent of the Technical Specifications are being made.

The margin of safety in the bases for Technical Specification 3.6.1.6 is not reduced since this change only provides clarification of the existing Surveillance Requirements. Inspections of concrete crack patterns initially selected during the Structural Integrity Test will continue to be performed during the Type "A" Integrated Leakage Rate Tests. Additionally, the concrete surfaces adjacent to tendon anchorages will be inspected for those tendons selected per the recommendations of Regulatory Guide 1.35, Revision 2.

Based upon the above considerations, we have concluded that the proposed change represents an example of an amendment that is considered not likely to involve Significant Hazards Consideration under Section (i), as described on page 14870 of the Federal Register Notice dated April 6, 1983.

CHANGE NO. 4 (BG&E FCR 85-19)

Remove the existing page 3/4 8-3 of the Unit 1 & 2 Technical Specifications and replace with attached marked-up page.

DISCUSSION

This proposed change to Technical Specifications is being processed in response to reference (d), Unresolved Item 317/83-31-06, concerning incorporation of the Auxiliary Feedwater (AFW) pump motor No. 13 (No. 23 for Unit 2) as the largest single load supplied by the diesel generator. Technical Specification Surveillance Requirement 4.8.1.1.2.c.2. tests the diesel generator's ability to reject the largest single load without tripping. With the addition of a third auxiliary feedwater train, the largest single load is now the motor driven AFW pump, rated at 500 hp. Accordingly, it is proposed that this Surveillance Requirement be changed to reflect the new largest single load.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

This proposed change has been reviewed against the standards set forth in 10 CFR 50.92 and has been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed amendment would not:

- (i) involve an increase in the probability of occurrence or consequences of an accident previously evaluated; or
- (ii) create the possibility of a new or different kind of accident from any accident previously analyzed; or
- (iii) involve a significant reduction in the margin of safety.

The proposed change would increase the size of the load that must be periodically rejected by the diesel generator by about 10%. This would provide greater assurance of the generator's capability to respond to the loss of the single largest load. Therefore, the probability or consequences of previously analyzed accidents would not be affected and the margin of safety would not be reduced.

No physical modification is associated with this proposed change. Increasing the size of the load to be periodically rejected by surveillance testing would not create the possibility of a new or different accident.

CHANGE NO. 5 (BG&E FCR 85-20)

Remove existing pages 3/4 8-8, 8-9, and 8-11 of the Unit 1 and Unit 2 Technical Specifications and replace with attached marked-up pages.

DISCUSSION

The proposed change would recognize the use of the Reserve Battery in the Limiting Condition for Operation of the DC Distribution System in OPERATIONAL MODES 1 through 6. This change is desirable since Technical Specification 3.0.4 would not be in effect when the Reserve Battery is used in place of one of the normal 125-volt DC battery banks. In addition, the Reserve Battery would be allowed as one of two OPERABLE batteries in OPERATIONAL MODES 5 and 6. Unlimited use of the Reserve Battery when necessary, i.e. when a normal 125-volt battery bank is inoperable or when surveillance testing requires, is allowed by current Technical Specification Action Statements in OPERATIONAL MODES 1 through 4.

The proposed change would add the word "associated" in two places for each DC train in the Limiting Condition for Operation in OPERATIONAL MODES 1 through 4 to specify that the 125-volt DC battery and charger must be a part of that respective train.

The proposed change would delete two Action Statements and change a third Action Statement for DC Distribution in OPERATIONAL MODES 1 through 4. During surveillances 4.8.2.3.2.c.2, 4.8.2.3.2.d.2, and 4.8.2.3.2.f which render the normal battery bank inoperable, the Reserve Battery is connected to the affected 125-volt DC bus. This condition would now be recognized by the Limiting Condition for Operation and, therefore, need not be recognized in the Action Statements.

Finally, the proposed change would correct a grammatical error in Technical Specification 3.8.2.4. The word "bus" would be made plural in two places.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

This proposed change has been reviewed against the standards set forth in 10 CFR 50.92 and has been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed amendment would not:

- (i) involve an increase in the probability of occurrence or consequences of an accident previously evaluated; or
- (ii) create the possibility of a new or different kind of accident from any accident previously analyzed; or
- (iii) involve a significant reduction in the margin of safety.

The proposed change would allow use of the Reserve Battery as one of the two OPERABLE batteries in OPERATIONAL MODES 5 and 6 and would allow entry into other OPERATIONAL MODES when the Reserve Battery is being used. NRC Safety Evaluations accompanying references (e) and (f) stated that the Reserve Battery has sufficient capacity to perform the function of the battery it replaces; that the Reserve Battery and associated equipment were fully-qualified and safety-related; that the reserve battery installation and Surveillance Requirements were equivalent to the existing batteries; and, that sufficient administrative controls exist to ensure proper use of the Reserve Battery. Since the Reserve Battery is fully capable of replacing any of the normal 125-volt DC batteries the probability or consequences of previously analyzed accidents would not be affected and the margin of safety would not be reduced.

No equipment, system alignment or procedure different from those recognized by current Technical Specifications are involved in this proposed change. Therefore, the possibility of a different kind of accident is not created.

CHANGE NO. 6 (BG&E FCR 85-21)

Remove pages 3/4 3-45 and 46 of the Unit 1 and 2 Technical Specifications and replace with the marked-up pages attached to this transmittal.

DISCUSSION

The proposed change incorporates additional fire detection instrumentation, eliminates redundant entries, and provides additional clarification. The proposed changes are either an improvement to safety or administrative, and neither involve significant hazards consideration.

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One heat detector was replaced with a smoke detector and three more smoke detectors were added as a result of modifications to the 69' access control area. The heat detector was located in the women's locker room. A smoke detector would have spuriously alarmed from the steam and mist. The area has since been remodeled into a laboratory where a smoke detector would be more suitable for fire detection. (The NRC was notified and granted permission for the temporary inoperability of the fire detection system for the areas being remodeled).

During our review of these changes and the administrative processing of Amendment 96 (Unit 1), several duplicate entries were noted. Both the North South Corridor Room 410 and North South Corridor Room 308 were listed twice. The number of fire detectors in these areas has not been reduced, only the duplicate listings should be eliminated.

Additional clarification has been proposed as follows. The room numbers and room names should be changed as indicated to reflect their proper names. The Intake Structure has been listed as a common structure. Although the Intake Structure is a single room, the equipment in each side is dedicated to its respective unit. To provide better clarification, the fire detection instrumentation serving the Unit 1 side of Intake Structure should be exclusively listed in the Unit 1 Technical Specification and similarly for Unit 2.

The last clarification concerns the Protecto Wire Instrumentation. The current Technical Specification lists this instrument location as the Southwest and Northeast Containment Electrical Penetration Rooms. Actually, the instrument meters are located in these rooms, but the Protecto Wires monitor cable trays. The Protecto Wires are also not conventional heat detectors. If a fire occurs in the cable tray, the insulation between the wires melts and the wires short. The new electrical resistance corresponds to a wire length which can then be used to determine the location of the fire.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed changes to Technical Specifications have been reviewed against the standards in 10 CFR 50.92 regarding significant hazard considerations. The replacement smoke detector and the addition of three more smoke detectors is an additional restriction not presently included in the Technical Specifications. These proposed changes are consistent with example (ii) of amendments considered not likely to involve significant hazards considerations as printed in Federal Register Notice 14870 dated April 6, 1983. The remaining changes are administrative and only provide additional clarification. This change is also consistent with example (i) of amendments not likely to involve significant hazards considerations as printed in the Federal Register.

Operation of the facility in accordance with this proposed change will not:

- (i) Involve any increase in the probability or consequences of an accident previously evaluated in the Updated FSAR.

The substitution and addition of four smoke detectors is an improvement to safety and the remaining changes are purely administrative clarifications.

- (ii) Create the possibility of occurrence of an accident different from an accident previously evaluated.

The smoke detectors are a standard design so no new systems interaction will occur.

- (iii) Involve any significant decrease in the margin of safety as described in the bases for Technical Specifications.

The margin of safety will be improved by substitution and addition of four smoke detectors. The additional requirement will ensure the detectors are operable to perform their intended function.

CHANGE NO. 7 (BG&E 85-22)

Remove the existing page 3/4 6-26 of the Unit 1 and Unit 2 Technical Specifications and replace with attached marked-up page.

DISCUSSION

In response to NUREG-0737, Calvert Cliffs installed improved Containment Hydrogen Analyzers. The improved design included a wide range of detection, 0 to 10 percent hydrogen, and remote sampling operation.

Guidance Technical Specifications were issued by the NRC in Generic Letter 83-37. These guidance Technical Specifications included additional Surveillance Requirements and an Action requirement should both hydrogen analyzers be inoperable. Negotiations with NRC staff personnel have concluded that adding a Surveillance Requirement to address the periodic check of our hydrogen analyzer indicators would adequately meet the intent of the additional Surveillance Requirements.

Calvert Cliffs currently utilizes the hydrogen analyzer sample pump and indicator to draw a sample on the Waste Gas System. This sample analysis adequately checks the response of the indicator and the operation of the sample pump. The proposed additional Surveillance Requirement would require a sample to be drawn in this manner biweekly on a Staggered Test Basis.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed change has been reviewed against the standards provided in 10 CFR 50.92 regarding significant hazards considerations. It has been determined that it constitutes an example of an amendment considered not likely to involve significant hazards considerations, in that operation of the facility in accordance with the proposed change would not:

- (i) involve any increase in the probability or consequences of an accident previously evaluated.

The hydrogen analyzers are installed to provide indication of the hydrogen concentration within the containment atmosphere following a Loss of Coolant Accident. No automatic functions are performed by the analyzers.

- (ii) create the possibility of a new or different type of accident from any accident previously evaluated.

This proposed change does not add or delete any equipment to the facility. It simply provides a reasonable time to repair one analyzer should both be rendered inoperable and establishes more restrictive Surveillance Requirements than current Technical Specifications.

- (iii) involve any reduction in the margin of safety.

The proposed change involves a more restrictive Surveillance Requirement than current Technical Specifications. Therefore, the proposed change should result in an improvement to the margin of safety.

CHANGE NO. 8 (BG&E FCR 85-23)

Remove existing pages 3/4 7-5 and 7-5b of the Unit 1 Technical Specifications and page 3/4 7-5a of the Unit 2 Technical Specifications and replace with marked-up pages attached to this transmittal.

DISCUSSION

The NRC approved Auxiliary Feedwater Technical Specifications, in License Amendment 78 for Unit 2, delineating a maximum out-of-service time of seven days should either a motor-driven or steam-driven pump be rendered inoperable. In subsequent phone conversations, our staff agreed to adopt similar out-of-service times for the Unit 1 Technical Specifications. We understand that the review completed by the NRC specified that time periods beyond seven days were considered unacceptable, since overall system unavailability was excessive.

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Although the BG&E plant staff does not agree with this conclusion, we are submitting the proposed revisions to the Unit 1 AFW Technical Specifications as agreed earlier. We plan to submit further AFW Technical Specification change requests, with additional evaluations of system availability, at a later date.

The other issues contained in this proposed change address various administrative and typographical error changes necessary to clarify the AFW Technical Specifications for Unit Nos. 1 and 2. These changes are summarized below:

<u>CHANGE DESCRIPTION</u>	<u>REASON</u>
1. Delete note addressing Unit 1 Cycle 7 one time inoperability.	This note has expired - will prevent misinterpretation.
2. Correct spelling of standby in note on bottom of page 3/4 7-5 (U-1).	Typographical error.
3. Correct spelling of characteristics on page 3/4 7-5b (U-1).	Typographical error.
4. Add word "and" to end of Surveillance Requirement (U-1).	Clerical error.
5. Correct Action c. to permit disabling AFW subsystem(s) to permit Logic Testing (U-2).	The Logic Testing disables one motor- and steam-driven train, momentarily.
6. Add close parenthesis to Surveillance Requirement a.4 (U-2).	Clerical error.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

This proposed change has been reviewed against the standards in 10 CFR 50.92 regarding significant hazards considerations. We have determined that the proposed change is consistent with two examples provided in Federal Register Notice 14870 dated April 6, 1983, items (i) and (ii) are examples of amendments that are considered not likely to involve significant hazards considerations.

Operation of the facility in accordance with this proposed change will not:

- (i) involve any increase in the probability or consequences of any accident previously evaluated.
- (ii) create the possibility of a new or different type of accident from any accident previously evaluated.
- (iii) involve any reduction in the margin of safety.

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This is because the change imposes additional restrictions, limitations, or controls not currently within the Technical Specifications and corrects errors in the wording of current Technical Specifications.

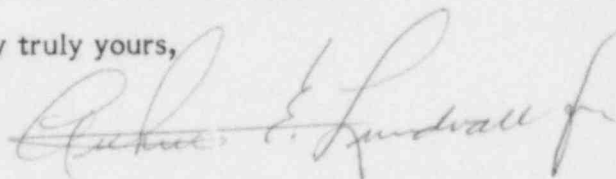
SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications and our 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.

FEE DETERMINATION

Pursuant to 10 CFR 170.21, we are including BG&E Check No. A323420 in the amount of \$150.00 to the NRC to cover the application fee for this request.

Very truly yours,



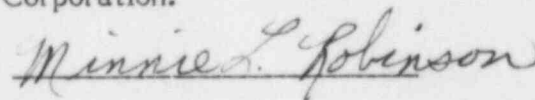
STATE OF MARYLAND :

TO WIT:

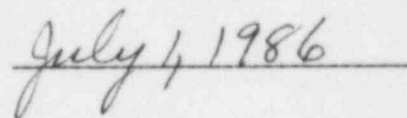
CITY OF BALTIMORE :

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:



My Commission Expires:



AEL/BEH/JJN/LES/MTF/tlm/sjb

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