



1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

GEORGE C. CREEL
SENIOR VICE PRESIDENT
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September 25, 1992

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
License Amendment Request

- REFERENCES:
- (a) Letter from Mr. J. A. Tiernan (BG&E) to NRC Document Control Desk, dated June 16, 1988, Request for Amendment
 - (b) Letter from Mr. D. G. McDonald, Jr. (NRC) to Mr. G. C. Creel (BG&E), dated June 10, 1991, Issuance of Amendments for Calvert Cliffs Nuclear Power Plant, Unit No. 1 (TAC Nos. M69238 and M69246) and Unit No. 2 (TAC Nos. M69239 and M69247)

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.

DESCRIPTION

The proposed amendment would revise the Technical Specifications for both Units 1 and 2 to remove the requirement to verify valve position every 31 days for valves that are locked, sealed or otherwise secured in position in the Auxiliary Feedwater System. This change is consistent with the requirements of the Combustion Engineering Standard Technical Specifications (NUREG-0212, Revision 2).

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BACKGROUND

Currently, Technical Specification 4.7.1.2.a.4 requires each valve in the auxiliary feedwater flow path be verified to be in its correct position every 31 days. The proposed change would exclude those valves which are locked, sealed or otherwise secured in position. These valves are included in our program that provides administrative control requirements for locked valves. A copy of this procedure was provided for your review of a similar Technical Specification change to the containment spray Surveillance Requirements [Amendment requested in Reference (a) and approved in Reference (b)]. Valves which are locked, sealed or otherwise secured in position are currently excluded from the verification requirement for the Emergency Core Cooling System, Component Cooling Water System, Service Water System, Saltwater System, and Containment Spray System. This change makes the consideration of such valves in the Technical Specifications consistent.

REQUESTED CHANGE

Change Specifications 3/4.7.1.2 of the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal.

SAFETY ANALYSES / JUSTIFICATION

The safety function of the Auxiliary Feedwater System is to remove decay heat from the Reactor Coolant System following accidents which involve a loss of main feedwater. In support of this function, Technical Specification 4.7.1.2.a.4 requires each valve in the auxiliary feedwater flow path to be verified to be in its correct position every 31 days. The proposed change would exclude those valves which are locked, sealed or otherwise secured in position. These valves are included in our procedure that provides administrative control requirements for locked valves. Valves which are locked, sealed or otherwise secured in position are already excluded from the verification requirement for the Emergency Core Cooling System, Component Cooling Water System, Service Water System, Saltwater System, and Containment Spray System. A locked, sealed or otherwise secured valve gives equivalent assurance that the valve will remain in the correct position as the 31-day surveillance does. This change makes the consideration of such valves in Technical Specifications consistent. This change will also make the Technical Specification consistent with the Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors (NUREG-0212, Revision 2). The position of these valves is administratively controlled to minimize the probability of mispositioning. If they are deliberately taken out of their locked, sealed or secured position, the valves would be checked on the surveillance requirement interval of 31 days.

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendment:

- (1) *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The safety function of the Auxiliary Feedwater System is to remove decay heat from the Reactor Coolant System following accidents which involve a loss of main feedwater. In support of this function, Technical Specification 4.7.1.2.a.4 requires each valve in the auxiliary feedwater flow path be periodically verified to be in its correct position. The proposed change would exclude those valves which are locked, sealed or otherwise secured in position. These valves are included in our procedure that provides administrative control requirements for locked valves. A locked, sealed or otherwise secured valve gives equivalent assurance that the valve will remain in the correct position as the 31-day surveillance does. This proposed change does not affect accidents evaluated in the Updated Final Safety Analysis Report (UFSAR). No change is being made to any accident initiators, mitigation features or assumptions. Therefore, this proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

The proposed change does not represent a change in the configuration or operation of the plant. The valves affected by this change will remain in their current position. Therefore, this proposed change does not create the possibility of a new or different type of accident from any accident previously evaluated.

- (3) *Would not involve a significant reduction in a margin of safety.*

Valves affected by this change are locked, sealed, or otherwise secured in position prior to entering the applicable operating conditions. Although this proposed change will remove the requirement that they be periodically verified, the administrative controls to lock, seal, or otherwise secure them in position make this periodic verification requirement unnecessary. A locked, sealed or otherwise secured valve gives equivalent assurance that the valve will remain in the correct position as the periodic verification requirement does. The probability of inadvertent operation of these valves is very low, and administrative controls exist in procedures if any of these valves are removed from their locked, sealed or otherwise secured condition. Therefore, this proposed change would not involve a significant reduction in a margin of safety.

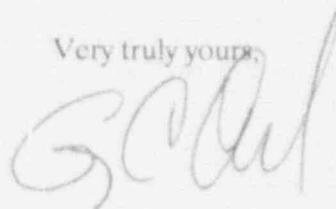
SCHEDULE

This change is requested to be approved and issued by May 1, 1993. However, issuance of this amendment is not currently identified as having an impact on outage completion or continued plant operation.

SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications and our determination of significant hazards 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 changes will not result in an undue risk to the health and safety of the public.

Very truly yours,



STATE OF MARYLAND :
: TO WIT :
COUNTY OF CALVERT :

I hereby certify that on the 25th day of September, 1992, 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 Senior 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:

January 1, 1994
Date

GCC/DJM/djm/dlm

Attachments: (1) Unit 1 Technical Specification Revised Page
(2) Unit 2 Technical Specification Revised Page

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
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