



1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

GEORGE C. CREEL
SENIOR VICE PRESIDENT
(410) 260-3690

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
Request for Amendment; Charcoal Filter Testing Requirements

- REFERENCES:
- (a) Letter from Mr. A. E. Lundvall, Jr. (BG&E) to Mr. R. A. Clark (NRC), dated February 24, 1983, Request for Amendment
 - (b) Regulatory Guide 1.52, Design, Testing, and Maintenance Criteria for Post Accident Engineered Safety Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants, Revision 2, March 1978
 - (c) NUREG-0212, Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors, Revision 2, December 1981
 - (d) Letter from Mr. G. C. Creel (BG&E) to NRC Document Control Desk, dated August 30, 1989, Request for Amendment
 - (e) Letter from Mr. D. G. McDonald, Jr. (NRC) to Mr. G. C. Creel (BG&E), dated April 27, 1990, Issuance of Amendments

Gentlemen:

Baltimore Gas and Electric Company (BG&E) hereby requests an Amendment to its Operating License Nos. DPR-53 and DPR-60 for Calvert Cliffs Unit Nos. 1 and 2, respectively, with the submittal of the proposed changes to the Technical Specifications. The proposed amendment would expand the acceptable methods for sampling charcoal filter units.

DESCRIPTION

The proposed amendments would expand the acceptable methods for obtaining samples from charcoal filter units by incorporating the sampling method described in Standard Technical Specifications. This test method was formerly in the Calvert Cliffs Technical Specifications, but was removed in 1983.

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BACKGROUND

In 1983, BG&E requested a license amendment which would allow the use of sectioned test trays for charcoal filter testing (Reference a). The proposed change added the option of taking charcoal samples from sectioned test trays in addition to the existing method of taking charcoal samples from standard adsorber trays. Taking charcoal samples from standard adsorber trays is the industry accepted method described in Regulatory Guide 1.52 (Reference b) and NUREG-0212 (Reference c). No changes were made in the chemical testing or test acceptance criteria for the charcoal samples. This change was approved as Amendments 83 (Unit 1) and 66 (Unit 2) (Reference c). During discussions between the NRC and BG&E regarding this change, a decision was made to eliminate the option to obtain charcoal filter samples from standard adsorber trays as it was believed that method of testing would not be used. Therefore, the current Calvert Cliffs Technical Specifications allow charcoal samples to be taken from sectioned adsorber test trays only.

Baltimore Gas and Electric Company has had some difficulty obtaining sectioned test trays in recent years and proposes to restore the option to take charcoal samples from standard adsorber trays in accordance with NRC Regulatory Positions.

REQUESTED CHANGE

Revise the following Technical Specifications as shown in Attachments (1) and (2):

4.6.3.1.b.3	Iodine Removal System
4.6.3.1.c.1	Iodine Removal System
4.6.6.1.b.3	Penetration Room Exhaust Air Filtration System
4.6.6.1.c.1	Penetration Room Exhaust Air Filtration System
4.7.6.1.c.3	Control Room Emergency Ventilation System
4.7.6.1.d	Control Room Emergency Ventilation System
4.7.7.1.b.3	ECCS Pump Room Exhaust Air Filtration System
4.7.7.1.c	ECCS Pump Room Exhaust Air Filtration System
4.9.12.b.3	Spent Fuel Pool Ventilation Systems
4.9.12.c	Spent Fuel Pool Ventilation Systems

SAFETY ANALYSIS / JUSTIFICATION

The proposed amendment does not change the testing method or test acceptance criteria for charcoal filter sample testing. The current test method was requested in Reference (d) in response to concerns raised in Information Notice 86-76, "Problems Noted in Control Room Emergency Ventilation Systems." It was approved in Reference (e). This test method is the same as that recommended in Regulatory Guide 1.52, Regulatory Position C.6.a.

The proposed sample collection method is described in NRC Regulatory Guide 1.52, Regulatory Position C.6.b, and in the Standard Technical Specifications, Reference (c). The format and content used in Standard Technical Specifications have been used as much as possible. Deviations from the standard were necessary to accommodate the approved use of sectioned test trays and the use of the test methods approved in Reference (e).

The proposed technical specifications require that samples taken from adsorber trays or adsorber test trays be taken in accordance with Regulatory Guide 1.52, Regulatory Position C.6.b. This Regulatory Position specifies the same collection methods as the current technical specifications, including sample mixing, sample size, and taking of successive samples.

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed change has been evaluated against the standard 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.*

Charcoal filter units are used to remove radioactive iodine from air systems following an accident and are not a precursor to any accident previously evaluated. Changes to the test sample collection method would not affect any accident precursors and would not change the probability of any accident.

The proposed change would allow charcoal filter samples to be collected from standard adsorber trays. The testing performed on the charcoal samples to verify their effectiveness is unchanged. Charcoal filter sample collection from standard adsorber trays is an approved method of sample collection which will have no adverse effect on the accuracy of the charcoal filter testing. Therefore, the proposed change will have no adverse effect on charcoal filter performance following an accident and their ability to mitigate the consequences of an accident.

Therefore, the proposed change will 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.*

This proposed change to the charcoal sample collection method does not involve a change in the design or operation of the plant. Therefore, this change would 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.*

The margin of safety provided by the charcoal filter units is the rated removal efficiency for radioactive iodine following an accident. The proposed changes do not alter the removal efficiency test acceptance criteria for charcoal filter samples. The proposed charcoal filter sample collection option is an approved method. The margin of safety provided by the charcoal filter units is unaffected. Therefore, this change would not involve a significant reduction in a margin of safety.

SCHEDULE

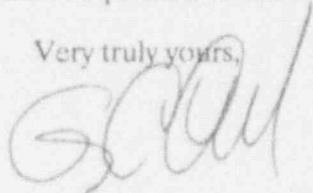
This change is requested to be approved by March 1, 1993. Approval will allow use of the proposed sample collection method during the spring 1993 Unit 2 refueling outage. This change is not associated with any outage limiting activity.

SAFETY COMMITTEE REVIEW

The proposed change 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.

Should you have any questions on this request, we would be pleased to discuss them with you.

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 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:

Anna L. McCready
Notary Public

My Commission Expires:

January 1, 1994
Date

GCC/BDM/bdm/dlm

Attachments

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
L. F. Nicholson, NRC
R. I. McLean, DNR
J. H. Walter, PSC