

BALTIMORE GAS AND ELECTRIC COMPANY

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NUCLEAR POWER DEPARTMENT
CALVERT CLIFFS NUCLEAR POWER PLANT
LUSBY, MARYLAND 20657

October 29, 1985

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

ATTENTION: Mr. A. C. Thadani, Project Director
PWR Directorate #8
Division of PWR Licensing-B

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Supplemental Information on Request for Amendment

REFERENCES: (a) Letter from A. E. Lundvall, Jr., BG&E, to E. J. Butcher, Jr., NRC
dated September 9, 1985, Request for Amendment.
(b) Letter from A. E. Lundvall, Jr., BG&E, to J. R. Miller, NRC, dated
April 26, 1985.

Gentlemen:

This letter forwards supplemental information, including marked up Technical Specification pages changed to incorporate some items discussed earlier with Mr. Jaffe of your staff. These pages are in substantial agreement with the NRC Guidance Technical Specifications in Generic Letter 83-37, with some minor exceptions. These exceptions are delineated as follows:

EXCEPTION

This proposed change includes example procedures which can include the Post Accident Sampling program specifics. The NRC's guidance Technical Specifications in Generic Letter 83-37 do not contain such example procedures.

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EXPLANATION

The wording "plant operation manuals" could be misleading. Calvert Cliffs includes training programs in procedures and instructions separate from the plant operations manuals. Additionally, the normal users of the PASS will be chemistry technicians, not operators. Therefore, Chemistry procedures will be used to describe PASS use during normal operations. Emergency Response Plan Implementing Procedures (ERPIPs) will be used to describe PASS system operations during post-accident conditions. Maintenance procedures will be used to maintain the equipment when necessary. All of these procedures receive reviews consistent with the requirements of the Quality Assurance (QA) Program in use at Calvert Cliffs, specifically ANSI N18.7-1976. To prevent this misleading terminology from resulting in major unnecessary changes in our QA Program, we are requesting these examples be included in the wording of the Technical Specifications.

For completeness, we are including other marked up Technical Specifications pages, as requested in references (a) and (b), to ensure the necessary changes to all the Technical Specifications are clearly delineated. The Determinations of Significant Hazards Considerations in references (a) and (b) are still valid for this change.

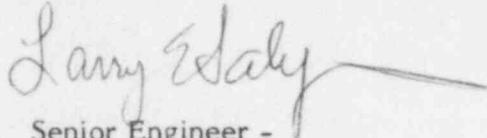
AFFECTED PAGES

<u>UNIT 1 (Attachment 1)</u>	<u>UNIT 2 (Attachment 2)</u>	<u>CHANGE</u>
IV	IV	As Shown
VII	VII	As Shown
XII	XII	As Shown
XVI	XVI	As Shown
3/4 3-47	3/4 3-47	Delete
3/4 7-78	3/4 7-70	Delete
B3/4 3-3	B3/4 3-3	As Shown
B3/4 7-7	B3/4 7-7	As Shown
6-22	6-22	Add

Mr. A. C. Thadani
October 29, 1985
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Should you have any questions regarding these matters, please feel free to contact us.

Very truly yours,

A handwritten signature in cursive script, reading "Larry Daly", followed by a horizontal line extending to the right.

Senior Engineer -
Operational Licensing & Safety

LES/sjb

Attachments

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

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INSTRUMENTATION

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The main vent iodine and particulate sampler shall be OPERABLE.

APPLICABILITY: All MODES.

ACTION:

- a. With the main vent iodine and particulate sampler inoperable, initiate the preplanned alternate method of sampling the main vent for the appropriate parameter(s) within 72 hours, and:
 1. either restore the inoperable sampler to OPERABLE status within 7 days of the event,
 2. prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

3.3.8 The main vent iodine and particulate sampler shall be demonstrated OPERABLE by comparing samples independently drawn from the main vent at least once per month.

PLANT SYSTEMS

3/4 7.13 POST-ACCIDENT SAMPLING

LIMITING CONDITION FOR OPERATION

3.7.13 The post-accident sampling system shall be OPERABLE and capable of processing samples from all of the below listed points:

- a. RCS sample via hot leg
- b. RCS sample via low pressure safety injection, and
- c. Containment sump sample via low pressure safety injection.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With the operability of the post-accident sampling system less than the LIMITING CONDITION FOR OPERATION specified above, within 72 hours initiate the preplanned alternate method of processing specified sample(s), and either:
 1. Restore the system to OPERABLE status within 7 days, or
 2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.13 The post-accident sampling system shall be demonstrated OPERABLE at least once per six (6) months by comparing the results of a RCS sample analyzed by laboratory techniques with the results analyzed by the below listed analyzing equipment:

1. Boron Analyzer
2. Hydrogen and Oxygen Analyzer
3. pH Analyzer
4. Liquid Radioisotopic Analyzer.

INSTRUMENTATION

BASES

3/4.3.3.6 POST-ACCIDENT INSTRUMENTATION

The OPERABILITY of the post-accident instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975, and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."

3/4.3.3.7 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to operability.

3/4.3.3.8 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION IODINE AND PARTICULATE SAMPLER

The OPERABILITY of the Iodine and Particulate Sampler ensures that Iodine and Particulate samples can be obtained for analysis during and following an accident. The surveillance requirements require a high degree of availability.

The sampler was installed to meet the requirements of NUREG-0737 Item II.F.1. The sampler's operation was not assumed in any accident analysis.

PLANT SYSTEMS

BASES

3/4.7.12 PENETRATION FIRE BARRIERS

The functional integrity of the penetration fire barriers ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The penetration fire barriers are a passive element in the facility fire protection program and are subject to periodic inspections.

During periods of time when the barriers are not functional, a continuous fire watch is required to be maintained in the vicinity of the affected barrier until the barrier is restored to functional status.

~~3/4.7.13 POST-ACCIDENT SAMPLING SYSTEM~~

~~The OPERABILITY of the Post-Accident Sampling System ensures the capability to obtain and analyze reactor coolant and containment atmosphere samples during and following an accident. The surveillance requirements ensure a high degree of availability.~~

~~The Post-Accident Sampling System was installed to meet the requirements of NUREG-0737 Item II.8.3. The system's operation was not assumed in any accident analysis.~~

ADMINISTRATIVE CONTROLS

6.15.1 IODINE MONITORING

The licensee shall implement a program* which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

6.15.2 The following program shall be established, implemented, and maintained:

Postaccident Sampling

A program* which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

*It is acceptable if the licensee maintains details of the program in plant operation manuals (e.g., chemistry procedures, training instructions, maintenance procedures, ERPIPs).

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INSTRUMENTATION

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The main vent iodine and particulate sampler shall be OPERABLE.

APPLICABILITY: All MODES.

ACTION:

- a. With the main vent iodine and particulate sampler inoperable, initiate the preplanned alternate method of sampling the main vent for the appropriate parameter(s) within 2 hours; and
 1. either restore the inoperable sampler to OPERABLE status within 7 days of the event, or
 2. prepare and submit a written report to the Commission pursuant to Specification 3.0.2 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

4.3.3.8 The main vent iodine and particulate sampler shall be demonstrated OPERABLE by comparing samples independently drawn from the main vent at least once per month.

PLANT SYSTEMS

3/4.7.13 POST-ACCIDENT SAMPLING

LIMITING CONDITION FOR OPERATION

3.7.13 The post-accident sampling system shall be OPERABLE and capable of processing samples from all of the below listed points:

- a. RCS sample via hot leg
- b. RCS sample via low pressure safety injection, and
- c. Containment sump sample via low pressure safety injection.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With the operability of the post-accident sampling system less than the LIMITING CONDITION FOR OPERATION specified above, within 72 hours initiate the preplanned alternate method of processing specified sample(s), and either:
 1. Restore the system to OPERABLE status within 7 days, or
 2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.3.2 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.13 The post-accident sampling system shall be demonstrated OPERABLE at least once per six (6) months by comparing the results of a RCS sample analyzed by laboratory techniques with the results analyzed by the below-listed analyzing equipment:

1. Baron Analyzer
2. Hydrogen and Oxygen Analyzer
3. pH Analyzer
4. Liquid Radioisotopic Analyzer.

INSTRUMENTATION

BASES

3/4.3.3.6 POST-ACCIDENT INSTRUMENTATION

The OPERABILITY of the post-accident instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975, and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."

3/4.3.3.7 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to operability.

3/4.3.3.8 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION IODINE AND PARTICULATE SAMPLER

The OPERABILITY of the Iodine and Particulate Sampler ensures that Iodine and Particulate Samples can be obtained for analysis during and following an accident. The surveillance requirements ensure a high degree of availability.

The sampler was installed to meet the requirements of NUREG-0737, Item 11.F.1. The sampler's operation was not assumed in any accident analysis.

PLANT SYSTEMS

BASES

3/4.7.12 PENETRATION FIRE BARRIERS

The functional integrity of the penetration fire barriers ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The penetration fire barriers are a passive element in the facility fire protection program and are subject to periodic inspections.

During periods of time when the barriers are not functional, a continuous fire watch is required to be maintained in the vicinity of the affected barrier until the barrier is restored to functional status.

3/4.7.13 POST-ACCIDENT SAMPLING SYSTEM

The OPERABILITY of the Post-Accident Sampling System ensures the capability to obtain and analyze reactor coolant and containment atmosphere samples during and following an accident. The Surveillance Requirements ensure a high degree of availability.

The Post-Accident Sampling System was installed to meet the requirements of NUREG-0737 Item II.8.3. The system's operation was not assumed in any accident analysis.

ADMINISTRATIVE CONTROLS

6.15.1 IODINE MONITORING

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

6.15.2 The following program shall be established, implemented, and maintained:

Postaccident Sampling

A program* which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

*It is acceptable if the licensee maintains details of the program in plant operation manuals (e.g., chemistry procedures, training instructions, maintenance procedures, ERPIPs).