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ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

September 9, 1985

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

ATTENTION: Mr. Edward J. Butcher, Jr., Acting 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

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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.

#### PROPOSED CHANGE

Change existing pages 3/4 3-26, 3/4 3-28, 3/4 7-78 and 6-22 of the Unit 1 Technical Specifications and pages 3/4 3-26, 3/4 3-28, 3/4 7-70, and 6-22 of the Unit 2 Technical Specifications and other pages as shown on the marked-up pages attached to this transmittal.

#### DISCUSSION

The proposed change relocates the requirements for the Main Vent Wide Range Iodine and Particulate Sampler from Table 3.3-6 to Section 6.16 of the administrative Technical Specifications. In addition, the change relocates the requirements for the post accident reactor coolant sampling system from Section 3/4 7.13 to Section 6.16 of the administrative Technical Specifications.

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BG&E earlier requested a license amendment on June 29, 1984, proposing a Technical Specification in the form of a Limiting Condition for Operation (LCO) Technical Specification 3/4 7.13. In the same letter, BG&E requested a LCO for the Iodine and Particulate Sampler in the Main Vent Wide Range Noble Gas Instrument.

Now, BG&E has changed its position on these LCO's and has decided to apply for adoption of an administrative Technical Specification, as recommended by the NRC in Generic Letter 83-37 dated November 1, 1983.

#### **DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS**

This proposed change simply relocates Technical Specification coverage from one Section to another. This relocation does not in any way reduce the level of control of the requirements. In addition, the new location is consistent with the guidance provided in Generic Letter 83-37. This proposed change is administrative in nature and has been determined to involve no significant hazards considerations, in that operation in accordance with the proposed change to the Technical Specifications would not:

- i) Involve any increase in the probability or consequences of any accident previously evaluated in the Updated FSAR; or
- ii) Create the possibility of a new or different kind of accident from any accident previously evaluated in the Updated FSAR; or
- iii) Involve any reduction in the margin of safety.

#### **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.

Mr. E. J. Butcher, Jr.  
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**FEE DETERMINATION**

Pursuant to 10 CFR 170.21, we are including BG&E Check No. (B398314) in the amount of \$150.00 to the NRC to cover the application fee for this request.

Very truly yours,



STATE OF MARYLAND :

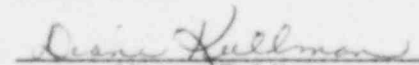
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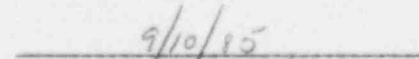
CITY OF BALTIMORE :

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:

  
Notary Public

My Commission Expires:

  
Date

AEL/LES/sjb

Attachment

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