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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

August 15, 1985

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

ATTENTION: Mr. Edward J. Butcher, Acting Chief
Operating Reactors Branch #3

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Primary Reactor Containment Testing
Request for Relief from 10 CFR 50 Appendix J Requirements

Gentlemen:

In accordance with 10 CFR 50.12, we are requesting an exemption from certain requirements of 10 CFR 50.54(o) that have been determined to be impractical. As outlined in 10 CFR 50.12, the information concerning the exemption request is presented herein.

The requirements of 10 CFR 50 Appendix J III.D.1(a) specify "... a set of three tests shall be performed, at approximately equal intervals during each 10-year service period. The third test of each set shall be conducted when the plant is shutdown for the 10-year plant Inservice Inspections (ISI)" In addition to the Appendix J requirements, the Calvert Cliffs Unit 1 & 2 Technical Specifications specify the Type A tests must be performed every 40+10 months. In order to meet this time requirement, a one-time exemption was granted for the first 10-year service period. This allowed Calvert Cliffs to perform the third test prior to the 10-year ISI outage.

We are now requesting a permanent exemption from the requirement to conduct the third ILRT during the shutdown for each 10-year ISI outage, in that no 10-year ISI outage activity specifically alters containment integrity. We feel that the intent of the codes are satisfied by the 40+10 month frequency. Our scheduled refueling outages are indicated in the following table.

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CALVERT CLIFFS REFUELING OUTAGES

UNIT ONE

Spring 82
Fall 83
Spring 85*
Fall 86***
Spring 88**
Fall 89

UNIT TWO

Fall 82*
Spring 84
Fall 85**
Spring 87***
Fall 88
Spring 90

* Last completed ILRT
** Next scheduled ILRT
*** 10-year ISI outage

(Outage dates based on current 18-month refueling cycle)

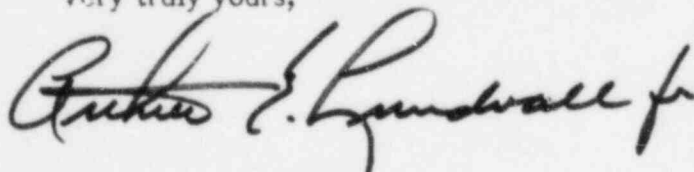
No other requirement of 10 CFR 50.54 or Appendix J will be affected by granting the exemption. Our previous Type A test performance dates and scheduled 10-year ISI outages make it impractical to perform the Type A test during each 10-year ISI outage. This request deletes the need for submitting future exemption requests when Type A testing and 10-year ISI outages do not coincide.

Granting the requested exemption will not give rise to an adverse impact on the environment. Performance of the Type A test will continue to ensure satisfactory containment performance. It is in the public benefit to grant the requested exemption as it ensures the safest and most economical testing schedule.

Pursuant to 10 CFR 170.21, Baltimore Gas & Electric Check No. A344146 in the amount of \$150 is remitted to cover the application fee for this request.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,



AEL/OPB/gla

Attachment

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