

CHARLES H. CRUSE  
Vice President  
Nuclear Energy

Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, Maryland 20657  
410 495-4455



June 18, 1997

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  
Response to Request for Additional Information Regarding the License  
Amendment Request to Convert to the Improved Technical Specifications  
(TAC Nos. M97363 and M97364)

REFERENCE: (a) Letter from Mr. A. W. Dromerick (NRC) to Mr. C. H. Cruse (BGE),  
dated May 7, 1997, Request for Additional Information Regarding the  
License Amendment Request to Convert to the Improved Technical  
Specifications (TAC Nos. M97363 and M97364)

The referenced letter transmitted questions regarding Sections 4.0 and 5.0 of Baltimore Gas and Electric Company's application to convert to the Improved Standard Technical Specifications. The responses are attached. Changes to the application described in the responses will be reflected in a future revision to the application. If the revision contains changes which differ from these responses, those differences will be identified.

AD011



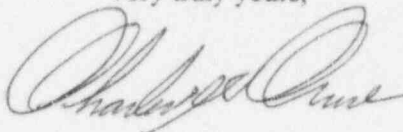
9706240210 970618  
PDR ADOCK 05000317  
P PDR

June 18, 1997

Page 2

Should you have further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



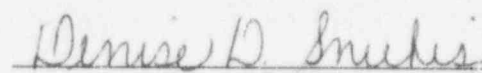
STATE OF MARYLAND :  
: TO WIT:  
COUNTY OF CALVERT :

I, Charles H. Cruse, being duly sworn, state that I am Vice President, Nuclear Energy Division, Baltimore Gas and Electric Company (BGE), and that I am duly authorized to execute and file this response on behalf of BGE. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other BGE employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.



Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of Calvert, this 18th day of June, 1997.

WITNESS my Hand and Notarial Seal:

  
Notary Public

My Commission Expires:

2/2/98  
Date

CHC/JV/dlm

Attachments: (1) Response to Questions, Calvert Cliffs Improved Technical Specification Section 4.0  
(2) Response to Questions, Calvert Cliffs Improved Technical Specification Section 5.0

cc: R. S. Fleishman, Esquire  
J. E. Silberg, Esquire  
A. W. Dromerick, NRC  
Director, Project Directorate I-1, NRC

H. J. Miller, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR  
J. H. Walter, PSC

**ATTACHMENT (1)**

---

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**CALVERT CLIFFS NUCLEAR POWER PLANT**

**IMPROVED TECHNICAL SPECIFICATIONS**

**SECTION 4.0 DESIGN FEATURES**

---

**ATTACHMENT (1)**  
**CCNPP ITS 4.0 DESIGN FEATURES**

4.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		2	STS 4.2.2 includes details specifying the control element assembly control material. ITS 4.2.2 deletes this detail, resulting in an STS deviation. Adequate justification is not provided for the deviation.	Provide additional discussion and justification for the STS deviation, based on system design, operational constraints, or current licensing basis.	

**BGE Response:**

On March 14, 1995, the Nuclear Regulatory Commission approved an amendment to the Calvert Cliffs Technical Specifications which adopted Design Features that were generally consistent with the format and content of the Improved Standard Technical Specifications for Combustion Engineering plants, NUREG-1432, Revision 1. In our December 8, 1993 and March 2, 1995 letters requesting the amendment, we justified not including the control element assembly (CEA) materials in the Design Features, as the CEA materials were not in our Technical Specifications prior to this amendment. The Nuclear Regulatory Commission accepted this, and the issued amendment did not include the CEA materials. In the Improved Technical Specifications conversion submittal, Baltimore Gas and Electric Company has retained our current Design Features requirements, with only editorial changes. As we stated in the Discussion of Deviation 2, this information is contained in the Updated Final Safety Analysis Report and controlled under 10 CFR 50.59, which is an adequate method of controlling this information.

**ATTACHMENT (2)**

---

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**CALVERT CLIFFS NUCLEAR POWER PLANT**

**IMPROVED TECHNICAL SPECIFICATIONS**

**SECTION 5.0 ADMINISTRATIVE CONTROLS**

---

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.5		CTS 6.2.1.a requires plant specific titles of personnel fulfilling the responsibilities of the positions delineated in the CTS documented in the Updated Final Safety Analysis Report (UFSAR). ITS 5.2.1.a is consistent with the CTS but also allows this information to be documented in the QA plan. This change to CTS requirements is based on TSTF-65.	Acceptance of this change to CTS requirements is based on the NRC acceptance of TSTF-65.	5/5/97 TSTF-65 still pending.
<b>BGE Response:</b>  Baltimore Gas and Electric Company (BGE) has no action. We are awaiting Nuclear Regulatory Commission (NRC) approval of TSTF-65. TSTF-65 was based on a letter from C. I. Grimes (NRC) to Lee Bush (WOG), Brian Mann (CEOG), Clinton Szabo (B&WOG) and Andrew Maron (BWROG), dated November 10, 1994, that recommended changes to the Administrative Controls section of the Technical Specifications.					
2	A.27		CTS 6.2.2.b requires at least one licensed operator in the Control room when fuel is in the reactor and two licensed operators present in the Control room during reactor STARTUP, scheduled reactor shutdown, and during trip recovery. ITS 5.0 does not include this requirement. This deletion of CTS requirements is based on TSTF-121.	Acceptance of this change to CTS requirements is based on the NRC acceptance of TSTF-121.	5/5/97 TSTF-121 modified, not yet approved.
<b>BGE Response:</b>  On April 9, 1997, in a letter from C. I. Grimes (Chief, Technical Specifications Branch, NRC) to James Davis (Nuclear Energy Institute), the NRC proposed several generic changes to the Administrative Controls. One of those changes recommended by the NRC is identical to the changes recommended in TSTF-121. Specific approval of TSTF-121 may be included as part of the change generated from the referenced letter.					



ATTACHMENT (2)  
CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2.a	A.3		CTS 6.2.2d states that an individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. The ITS changes this position to a radiation protection technician. The changes to the CTS requirements is based on TSTF-65	Acceptance of this change to the CTS requirements is based on the NRC acceptance of TSTF-65.	5/5/97 TSTF-65 still pending.
<b>BGE Response:</b>  Baltimore Gas and Electric Company has no action. We are awaiting NRC approval of TSTF-65. TSTF-65 was based on a letter from C. I. Grimes (NRC) to Lee Bush (WOG), Brian Mann (CEOG), Clinton Szabo (B&WOG) and Andrew Maron (BWROG), dated November 10, 1994, that recommended changes to the Administrative Controls section of the Technical Specifications.					
3			STS 5.2.2.f requires the [operation manager or assistant operations manager] to hold an SRO license. ITS 5.2.2.f requires the operation manager to hold <i>or have held</i> an SRO license at CCNPP. There is no discussion or justification for this deviation from the STS requirement.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>BGE Response:</b>  The justification for this change is given in Section 5.0, Discussion of Deviation 1. The Improved Standard Technical Specification (ISTS) Section 5.2.2.f states, "The [Operations Manager or Assistant Operations Manager] shall hold an SRO license." The justification given was, "This change incorporates the Calvert Cliffs-specific information into brackets." A Discussion of Deviation will be added to explain the specific qualifications for the operations manager at Calvert Cliffs, and Discussion of Deviation 1 will be used to explain the change in title inside the brackets of Standard Technical Specification (STS) 5.2.2.f.					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4		5	STS 5.2.2.g lists the Shift Technical Advisor (STA) requirements. ITS 5.2.2.g replaces the requirements entirely with a different list of STA requirements. There is inadequate justification for the deviation from the STS requirements for STAs.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>BGE Response:</b>  Proposed Improved Technical Specification (ITS) Section 5.2.2.g contains the Calvert Cliffs Shift Technical Advisor (STA) requirements contained in current Technical Specifications 6.2.2.g. and 6.3.1. The combination of these two sections (manning and training requirements) are shown in the current Technical Specification (CTS) markup, page 3 of 61. As stated in Section 5.0, Discussion of Deviation 5, these changes are consistent with the Calvert Cliffs current licensing basis. The license amendment numbers approving these requirements (216 Unit 1, 193 Unit 2) will be added to Discussion of Deviation 5.					
5	LA.3		CTS 6.5.1.c.2 requires changes to the Offsite Dose Calculation Manual (ODCM) be reviewed by the onsite review function and the plant manager. ITS 5.5.1.c.2 requires changes to the ODCM be reviewed by the plant manager. The CTS requirement for the onsite review function to review ODCM changes is moved to unspecified plant procedures. This change to the CTS is based on TSTF-65.	Provide discussion for this change to CTS requirements to include the specific procedures that will control the requirement. Acceptance of this change to the CTS requirements is based on the NRC acceptance of TSTF-65.	5/5/97 TSTF-65 is still pending.
<b>BGE Response:</b>  The issue raised is unrelated to TSTF-65. TSTF-65 addresses the change from "[Plant Superintendent]" to "plant manager." TSTF-65 does not address the elimination of the CTS requirement to have changes to the ODCM reviewed by the onsite review function.  Calvert Cliffs License Amendments 216/193, dated August 26, 1996, relocated the list of requirements for the onsite review function to the Quality Assurance Policy. Discussion of Change LA.3 will be modified to state that the onsite review function to review ODCM changes will be moved to the Quality Assurance Policy. The Quality Assurance Policy will be modified to include the detail.					



**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6, 7, 8, 9, 10, 11, 12		3	The ITS 5.4.4, Radioactive Effluent Controls Program, has been modified in accordance with CTS amendments 197 and 217. Amendment 217 was approved October 18, 1996, and amendment 197 was approved March 7, 1997.	Revise the CTS markups changed by amendments 197 and 217 and replace the pages.	
<b>BGE Response:</b>  Current Technical Specification Amendments 217 (Unit 1), 194 (Unit 2), approved on October 18, 1996, which implemented changes to the Radiological Effluent Controls Program, were used in the markup of the CTS. Note the amendment number in the lower right hand corner of each page on CTS markup pages 7, 8, and 9 of 61 in the Unit 1 CTS markup and pages 7, 8, and 9 in the Unit 2 CTS markup.  Current Technical Specification Amendments 221 (Unit 1), 197 (Unit 2), approved on March 7, 1997, modified the Technical Specifications to allow use of blind flanges in Modes 1 - 4 in the Containment Purge System instead of purge valves. As described in Volume 1, Attachment (2), "Outstanding Amendments and Generic Changes," of our submittal, this amendment was shown in our CTS markup. The CTS changes associated with this amendment request were marked in the CTS and indicated with the label "NRC 96-042." See pages 51 and 52 of 61 of the Unit 1 CTS markup and pages 47 and 48 of 57 of the Unit 2 CTS markup. The approved amendment accepted the proposed CTS changes without modification, so the CTS markup is not affected by the approval of the amendment. We intend to modify Attachment (2) to describe the approved amendments incorporated in the submittal with the amendment numbers and approval date.					
13			CTS 4.7.6.1.e.1 requires verifying that the pressure drop across the combined HEPA filters and charcoal absorber banks is < 4 inches Water Gauge while operating the ventilation system at a flow rate of 2000 cfm $\pm$ 10%. ITS 5.5.11.d requires the same verification but adds the prefilters to the HEPA filters and charcoal absorber bank. There is no discussion or justification for the change to CTS requirements.	Provide discussion and justification for the addition of the prefilters to the CTS requirement.  Classify this change as a More Restrictive change.	
<b>BGE Response:</b>  A more restrictive change will be included in a supplemental amendment request to the ITS application adding the prefilters to the CTS 4.7.6.1.e.1 requirement, and also CTS Sections 4.6.3.1.d.1, 4.6.6.1.d.1, 4.7.7.1.d, and 4.9.1.2.d.1.					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
14			STS 5.5.11.c requires demonstrating for each of the ESF systems that a laboratory test of a sample of the charcoal absorber, when obtained as described in [Regulatory Guide 1.52, Revision 2], shows the methyl iodide penetration less than the value specified below when tested in accordance with [ASTM D3803-1989] at a temperature of $\leq$ [30°C] and greater than or equal to the relative humidity specified as follows. ITS 5.5.1.1.c has the same requirements but adds (elemental iodine for Iodine Removal System (IRS)) and (103°C for IRS). There is no discussion or justification for the deviation to the STS.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>BGE Response:</b>  As shown on page 5.0-13 of the ISTS markup, the Iodine Removal System (IRS) requirements moved to the Ventilation Filter Testing Program (VFTP) are taken from CTS Surveillances. The specification of elemental iodine and the 130°C test temperature is given in CTS Surveillance 4.6.3.1.b.3 as shown in the Unit 1 CTS markup page 43 of 61 and Unit 2 markup page 39 of 57. Therefore, these requirements are consistent with the current licensing basis. The Discussion of Deviation associated with this difference from ISTS 5.5.11 states, "This change incorporates Calvert Cliffs-specific information into brackets." While the test temperature is bracketed in the ISTS, the form of iodine is not. Therefore, this description is not entirely accurate. We will create a new Discussion of Deviation which will state, "This change incorporates the current Calvert Cliffs requirements for the Iodine Removal System into the Ventilation Filter Testing Program. This requirement is consistent with the Calvert Cliffs' current licensing basis."					
15			STS 5.5.12 requires determining the liquid radwaste quantities in accordance with [Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release Due to Tank Failures"]. ITS 5.5.12 does not include this STS requirement. There is no discussion or justification for this STS deviation.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>BGE Response:</b>  Discussion of Deviation 11 explains that Calvert Cliffs does not have any outdoor liquid radwaste tanks and, therefore, ISTS Section 5.5.12.c, which applies to such tanks, is being deleted. The deleted information discussed in your question describes the method used to determine the quantity of liquid radwaste in such tanks. Therefore, the information is not needed. For clarity, we will add a reference to Discussion of Deviation 11 to the subject paragraph.					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
16		None	STS 5.5.12.b requires a surveillance program to ensure that the quantity of radioactivity contained in [each gas storage tank and fed into the offgas treatment system] is less than the amount that would result in a whole body exposure of $\geq 0.5$ rem to any individual in an unrestricted area, in the event of [an uncontrolled release of the tanks' contents]. ITS 5.5.12.b requires a surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than or equal to 58,500 curies noble gases (considered Xe-133). There is no discussion or justification for this deviation to the STS requirements.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>BGE Response:</b>  As shown in Unit 1 markup page 47 of 61 and Unit 2 markup page 43 of 57, the ITS 5.5.12.b limit on the quantity of radioactive material contained in each gas storage tank was taken from CTS LCO 3.11.1.2. Therefore, this deviation from the ISTS is consistent with the current licensing basis. We will add a Discussion of Deviation to Section 5 describing the deviation from the ISTS. Currently, this deviation is justified as a change incorporating Calvert Cliffs specific information into brackets, which is incorrect.					
17		12	STS 5.5.13.a.3 requires verifying the fuel oil has a clear and bright appearance with proper color. ITS 5.5.13.a.3 changes this requirement to verifying water and sediment $\leq 0.05\%$ .  CCNPP does not utilize a clear and bright test because the diesel fuel oil is dyed, and CCNPP contains a CTS SR which allows the interval for determining particulates in the stored diesel generator fuel oil to be 92 days.	5/5/97 The CCNPP Project Manager confirmed that FSAR Section 3.4.1, page 8.4-8 states that sampling of incoming fuel oil is analyzed for water and sediment. This is in the CCNPP design basis.	5/5/97 Closed
<b>BGE Response:</b>  None					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
17.a	M.4		Relative to ITS 5.5.13, DOC M.4 could be improved by more completely addressing the additional requirements associated with the Diesel Fuel Oil Program.	Revise DOC M.4 to more completely address the additional requirements associated with the Diesel Fuel Oil Program.	
<b>BGE Response:</b>  Discussion of Change M.4 will be enhanced in a future supplemental amendment request to the ITS application, to include the fact that the program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable American Society for Testing Materials (ASTM) Standards. Discussion of Change M.4 will also be combined with Discussion of Change M.5 to help clarify the explanation of the change.					
17.b	M.5		Relative to ITS 5.5.13, DOC M.5 could be improved by a more direct discussion of the testing performed on fuel oil and why such testing provides better assurance that the EDGs will function and is, therefore, a safety enhancement. The fact that these tests are currently performed as non-TS activities does not have the impact as the approach discussed above.	Revise DOC M.5 to directly discuss fuel oil testing and why such testing provides better assurance that the EDGs will function.	
<b>BGE Response:</b>  Discussion of Change M.5 will be enhanced and combined with Discussion of Change M.4 (see issue 17.a above) in a future supplemental amendment request to the ITS application. The combined Discussion of Change will be M.4 and will include the fact that the program is to establish: acceptability of new fuel for use prior to addition to the storage tanks; within 31 days following addition of the new fuel oil to the storage tanks, verify that the properties of the new fuel, other than those addressed prior to use, are within limits for ASTM 2D fuel oil; and total particulate concentration of the stored fuel oil, determined by gravimetric analysis, is less than or equal to 10 mg/l when tested every 92 days.					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
17.c	A.26		<p>DOC A.26 is not correct. CTS SR 4.8.1.1.2.b requires verifying DG operability "At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank is within the acceptable limits specified in Table 1 of SSTM D975-81 when checked for viscosity, water and sediment."</p> <p>The corresponding ITS 5.5.13.b requires, "Within 31 days following addition of the new fuel oil, other than those addressed in a., above are within limits for ASTM 2D fuel oil; and..." The change, which involves deleting the 92 day requirement, is a Less Restrictive change.</p>	Revise DOC A.26 to include deleting the 92-day requirement as a Less Restrictive change and justification for the 31-day requirement.	

**BGE Response:**

Discussion of Change A.26 will be withdrawn and L.3 will be written to address elimination of the tests on the diesel fuel from the fuel storage tank every 92 days for viscosity, water and sediment, and replacing the sediment test with a particulate test. Plant history has shown that the viscosity of the fuel oil does not change with time, and no additional water appears in the oil in the fuel storage tank with time. Improved Technical Specification Surveillance Requirement 3.8.3.3 also checks for and removes accumulated water from each fuel oil storage tank every 92 days. As fuel breaks down, it forms solids, which can be measured as particulate or sediment. Testing for particulates is a more sensitive means of testing for fuel breakdown than testing for sediment. The test for fuel breakdown will continue to be performed every 92 days, but using a more sensitive test.



**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
18		12	STS 5.5.13.c requires verifying total particulate concentration of the fuel oil is $\leq 10$ mg/l when tested every 31 days in accordance with ASTM D-2276, Method A-2 or A-3. The corresponding ITS 5.5.13.c requires verifying total particulate concentration of the fuel oil is $\leq 10$ mg/l when tested every 92 days when determined by gravimetric analysis. JFD 12 contains no justification for this deviation of STS testing methods.	Provide justification for the STS deviation based on current licensing basis, system design or operational constraints.	
<b>BGE Response:</b>  Discussion of Deviation 25 will be modified to explain that ASTM D-2276 Method A.3 is a gravimetric analysis, but the testing performed at Calvert Cliffs does not match all the detail contained in Method A.3. Among the differences at Calvert Cliffs, the reagents used are different, a filter reagent is not used, and the preparation of apparatus portions are not used. Method A.2 is for fuel systems under pressure, which is not used at Calvert Cliffs because there are not any systems in that category. The total particulate test requirement is replacing the CTS sediment test requirement for fuel oil breakdown indication.					
19		12	STS 5.5.13.c requires verifying total particulate concentration of the fuel oil is $\leq 10$ mg/l when tested every 31 days in accordance with ASTM D-2276, Method A-2 or A-3. The corresponding ITS 5.5.13.c requires verifying total particulate concentration of the fuel oil is $\leq 10$ mg/l when tested every 92 days when determined by gravimetric analysis. This extends the STS STI from 31 days to 92 days.	This justification should be revised to justify the 92 day interval between testing for impurities on its own merits, or retain the STS frequency of every 31 days. Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>BGE Response:</b>  Discussion of Deviation 12 will be modified to clarify the connection between sediment and particulate testing, and justify the 92-day frequency. Fuel oil breakdown results in solids in the fuel oil, which may be measured as particulate or sediment. Testing for particulates is a more sensitive way of testing for fuel oil breakdown. CTS 4.8.1.1.2.b requires the test for fuel oil breakdown (sediment) be performed every 92 days on diesel fuel oil from the fuel storage tank. The test for particulates will become the test for fuel oil breakdown, and will be performed at the same 92-day frequency that sediment is tested for. Changes to the ITS application will be included in a future supplemental amendment request.					



**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
20	LA.6		CTS Surveillance Requirements 3/4.6.1.1.c requires verifying the equipment hatch is closed and sealed prior to entering MODE 4 by performing a Type B test, and 3/4.6.1.1.d, requires verifying containment purge blind flanges are installed and sealed prior to entering MODE 4 by performing a Type B test. These surveillances are not included in the ITS, but are moved to the Containment Leakage Rate Testing Program. This change to CTS requirements is based on TSTF-52.	Acceptance of this change to CTS requirements is based on the NRC acceptance of TSTF-52.	4/11/97 TSTF plans to submit a revision of TSTF-52. 5/3/97 TSTF-52, R.1 not yet received.
<b>BGE Response:</b>  The change to CTS requirements is based on justification provided in Discussion of Change LA.6, which discusses the movement of details on components that require Type B testing to the Containment Leakage Rate Testing Program. TSTF-52 does add the Containment Leakage Rate Testing Program to the STS, but is not related to this removal of details from the CTS. Discussion of Change LA.6 describes movement of details regarding Containment Integrity to the Containment Leak Rate Testing Program. Discussion of Change LA.6 will be retracted, and a less restrictive Discussion of Change will be developed to eliminate aspects of the program that are addressed by Regulatory Guide 1.163, which is referenced in the specification.					
21	M.1		ITS 5.5.17, Battery Inspection Program (BIP), is added to the CTS requirements. The BIP requires battery tests recommended by IEEE-Std-450-1995, and is implemented by ITS SR 3.8.6.1. This change to CTS requirements is based on TSTF-115.	Acceptance of this change to CTS requirements is based on the NRC acceptance of TSTF-115.	TSTF-115 withdrawn by TSTF and replaced with TSTF-198, 199, 200, 201, and 203.  5/5/97 these TSTFs are under NRC review.
<b>BGE Response:</b>  Changes associated with TSTF-115 will be withdrawn because TSTF 115 has been withdrawn. We will not implement TSTFs 198 through 203, because they are not expected to be approved prior to issuance of the Calvert Cliffs ITS SER. The submittal will be changed to be consistent with NUREG 1432, Revision 1, and the CTS, unless justification is provided for a change.					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
22			CTS 6.6.1, Footnote *, requires reporting occupational dose from the Independent Spent Fuel Storage Installation (ISFSI) separately. The ITS does not include this requirement. There is no justification for this change to CTS requirements.	Provide discussion and justification for deleting the CTS requirement for reporting exposure from the ISFSI separately.	
<b>BGE Response:</b> A Discussion of Deviation will be added to explain that the CTS requirements are being retained. The changes will be incorporated in a future supplemental license amendment request.					
23		14	STS 5.6.1 requires, in part, that the dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. ITS 5.6.1 changes the mechanisms to measure dose rates by adding electronic personal dosimeter and deleting film badge measurements.	This change was made to reflect the actual mechanisms used at CCNPP to measure dose rates.	5/5/97 Closed
<b>BGE Response</b> None					
24		16	STS 5.6.2 contains a bracketed statement that requiring the report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result. JFD.16 states that this information is not adopted because the information is not consistent with CCNPP design or current licensing basis. However, this requirement is included in the CTS and ITS. This deviation of requirements requires clarification.	Clarify the deviation from the STS described in JFD.16.	
<b>BGE Response:</b> The Discussion of Deviation will be withdrawn and the information will be adopted in the ITS.					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
25	LA.8		CTS 6.6.3 includes a parenthetical statement emphasizing that the submittal of the Radioactive Effluent Release Reports must be no longer than 12 months, and footnote **, which allows a supplementary report to be submitted within 120 days. CTS 6.6.3 also includes information for reporting licensee initiated major changes to the Radioactive Waste Systems. The ITS do not contain these requirements which are moved to unspecified plant procedures.	Provide discussion of specific procedures that include the CTS requirements.	
<b>BGE Response:</b>  The parenthetical statement in CTS 6.6.3 emphasizing detail in 10 CFR 50.36a, that the time between submittal of the Radioactive Effluent Release Reports must be no longer than 12 months, is included in the requirement to abide by 10 CFR 50.36a. Discussion of Change LA.8 will be modified to state that requirements associated with reporting of changes to the Radioactive Waste Systems are contained in the ODCM and will be controlled by Section 5.5.1 of the ITS. The footnote ** allows a supplemental report containing Sr <sup>89</sup> and Sr <sup>90</sup> analyses' results to be submitted within 120 days after submittal of the Radioactive Effluent Release Report. To address this footnote, the phrase "as modified by approved exemptions" will be added to the statement that the Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The details regarding the exemption will be moved to the ODCM. Discussion of Change LA.8 will be modified to reflect these changes.					
26		18	STS 5.6.6 contains the requirements for the Reactor Coolant System (RCS) and Pressure Temperature Limits Report (PTLR). The ITS do not include this requirement.	CCNPP does not anticipate the temperature/pressure values to change from cycle to cycle, which would negate the benefits of the PTLR. Therefore, CCNPP will retain the specific pressure/temperature limits in the TS. This is part of the CCNPP system design and therefore, the change is acceptable.	5/5/97 Closed
<b>BGE Response:</b>  None					

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
27		19	STS 5.6.7 includes the requirements for reporting Emergency Diesel Generator failures. The ITS do not include this requirement based on TSTF-37.	Acceptance of this change to CTS requirements is based on the NRC acceptance of TSTF-37.	5/5/97 TSTF-37 rejected. TSTF-37, R.1 is pending.

**BGE Response:**

The Calvert Cliffs CTS does not include a Diesel Generator Failure Report. The STS 5.6.7 requirement is bracketed, which implies that it is plant specific. Therefore, regardless of the outcome of TSTF-37, since the Diesel Generator Failure Report is not part of the Calvert Cliffs current licensing basis, we request that this new report not be included in the ITS.

28	A.17		CTS 6.6, Reporting Requirements, does not include the Post Accident Monitoring Report. ITS 5.6.7 is added to the CTS requirements, and requires submitting a report within 14 days when required by Condition B or G of ITS 3.3.11, Post Accident Monitoring Instrumentation. This change to CTS requirements is documented as an Administrative change. The change is a More Restrictive change.	Reclassify this change to CTS reporting requirements as a More Restrictive change and justify.	
----	------	--	---	--	--

**BGE Response:**

The change described in A.17 only applies to those post accident monitoring instruments for which a report is not currently required. The Discussion of Changes justifying the addition of the report, both more and less restrictive, are provided in the Discussion of Changes for Section 3.3.10. Therefore, the addition of this report in Section 5.0 is administrative. For clarity, Discussion of Change A.17 will be revised to clearly state why it is administrative. In addition, it was noted that some post accident monitoring instruments in the CTS already required a special report. For these instruments, the CTS markup (from Section 3.3.10) and Discussion of Changes for the current special reporting requirements will be added to the Section 5.0 CTS markup and Discussion of Changes. This results in two new Discussion of Changes being added to Section 5.0 (one more and one less restrictive change) because the Discussion of Changes for ITS 3.3.10 states that they are moved to Section 5.0, but Section 5.0 does not contain all the appropriate Discussion of Changes.

**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
29	A.22		ITS 5.5.15 describes the Safety Function Determination Program. CTS does not include this requirement. This change to CTS requirements is documented as an Administrative change. The change is a More Restrictive change.	Reclassify this change to CTS requirements as a More Restrictive change and provide discussion.	
<b>BGE Response:</b>  The Safety Function Determination Program was added due to the change to CTS LCO 3.0.5 (ITS LCO 3.0.6). In the Discussion of Changes to Section 3.0, the addition of ITS LCO 3.0.6 was described as a less restrictive change. We also stated that a Safety Function Determination Program was added as part of the ITS LCO 3.0.6 addition. Therefore, an Administrative Change was used to add ITS 5.5.15, since the less restrictive attributes are already discussed in Section 3.0. Discussion of Change A.22 will be modified to clarify why it is administrative and to cross-reference the less restrictive Discussion of Change in Section 3.0.					
30	LA.5 LA.6 LA.7 LA.8		The referenced DOCS justify moving information outside the ITS by referring to the plant change control process. There is no description of this program or how changes to the program, or procedures governed by the program, are controlled.	Provide additional discussion and justification including a complete description of the Plant Change Control Process and how changes are controlled.	
<b>BGE Response:</b>  Discussion of Change LA.5 describes movement of details regarding Gaseous Effluents Explosive Gas Mixture and Gas Storage Tanks to the Explosive Gas and Storage Tank Radioactivity Monitoring Program. These details will be moved to the Technical Requirements Manual, which will be incorporated by reference into the UFSAR.  Discussion of Change LA.6 describes movement of details regarding Containment Integrity to the Containment Leak Rate Testing Program. Discussion of Change LA.6 will be retracted, and a less restrictive Discussion of Change will be developed to eliminate aspects of the of the program that are addressed by Regulatory Guide 1.163, which is referenced in the specification.  Discussion of Change LA.7 describes movement of details from several specifications to the Ventilation Filter Test Program. Discussion of Change LA.7 will be retracted. Some of the requirements that are addressed by Discussion of Change LA.7 are CTS requirements that are incorporated into the ITS, and they will be marked appropriately. No Discussion of Change is necessary for the retained requirements, and appropriate Discussions of Deviation will be added where requirements differ from the ISTS. A less restrictive Discussion of Change will be developed to eliminate post-maintenance requirements, which are contained in CTS 4.7.7.1.g, 4.6.6.1.g, 4.6.3.1.a, and 4.9.12.g, but do not meet the criteria for retention in the Technical Specifications.  Discussion of Change LA.8 describes movement of three sets of details. The disposition of these details is described in the answer to Question 20.					



**ATTACHMENT (2)**  
**CCNPP ITS 5.0 ADMINISTRATIVE CONTROLS**

5.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
31	L.2		ITS 5.5.8.c, Inservice Testing Program, adds a requirement allowing ITS SR 3.0.3 to be applicable to inservice testing activities. This requirement allows 24 hours or up to the limit of the Frequency, whichever is less, to perform Inservice Testing upon discovery that inservice Testing requirements were not performed. CTS 4.0.5 requires declaring the component Inoperable if the Inservice Testing is not performed. This change is a relaxation from the CTS requirements.	Change confirmed with the CCNPP Project Manager.	5/5/97 Closed
<b>BGE Response:</b>  None					
34	A.8		CTS 3/4.6.1.6 includes surveillance requirements for monitoring tendon degradation. These requirements are moved outside the ITS to the Concrete Containment Tendon Surveillance Program. ITS 5.5.6 describes the Concrete Containment Tendon Surveillance Program but has no requirements or description of how changes are controlled. This change is listed as an Administrative Change but is a Less Restrictive Change.	Provide additional discussion and justification reclassifying this change from an Administrative to a Less Restrictive Change including how changes to the Concrete Containment Tendon Surveillance Program are controlled.	
<b>BGE Response:</b>  Discussion of Change A.8 only addresses the addition of a description of requirements already contained in the CTS.  CTS Surveillances 4.6.1.6.1, 4.6.1.6.2, and 4.6.1.6.3 are moved to the Calvert Cliffs Tendon Surveillance Program, as documented in Discussion of Change LA.4. Discussion of Change LA.4 will be modified to state these details will also be moved to the Technical Requirements Manual. The Technical Requirements Manual will be modified to include the details.					