January 28, 2000

MEMORANDUM TO: BiWeekly Notice Coordinator

FROM: Alexander W. Dromerick, Sr. Project Manager, Section I ***/RA/***
Project Directorate I
Division of Licensing Project Management

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE - NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES, PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION, AND OPPORTUNITY FOR A HEARING (TAC NOS. MA8020 AND MA8021)

Baltimore Gas and Electric Company, Docket Nos. 50-317 and 50-318, Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, Calvert County, Maryland

Date of amendments request: January 25, 2000

Description of amendments request: The proposed amendment requests a revision to the definition of Response Time Testing (RTT) for the Reactor Protective System (RPS) and Engineered Safety Features Actuation System (ESFAS). The revision allows use of either an allocated sensor response time or a measured sensor response time for pressure sensors used in channels of RPS and ESFAS. The request is based on Combustion Engineering NPSD-1167, Revision 1, "Elimination of Pressure Sensor Response Time Testing Requirements - CEOG Task 1070."

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed licensing basis change does not involve a significant increase in the probability or consequences of an accident previously evaluated in the safety analysis report.

This change to the licensing basis does not result in a condition where the design, material, and construction standards that were applicable prior to the change are altered. The same Reactor Protective System and Engineered Safety Features Actuation System instrumentation is being used; the time response allocations/modeling assumptions in Updated Final Safety Analysis Report Chapter 14 analyses remain the same; only the method of verifying time response is changed. The proposed change will not modify any system interface and could not increase the likelihood of an accident since these events are independent of this change. The proposed activity will not change, degrade or prevent actions or alter any assumptions previously made in evaluating the radiological consequences of an accident described in the Updated Final Safety Analysis Report. Therefore, the proposed amendment does not result in any increase in the probability or consequences of an accident previously evaluated.

2. The proposed licensing basis change does not create the possibility of a new or different kind of accident from any accident previously evaluated in the safety analysis report.

   This change does not alter the performance of the pressure and differential pressure sensors used in the plant protection systems. These sensors will still have their response time verified before they are placed in operational service and after any maintenance to them that could affect their response time. Changing the method of periodically verifying instrument response for certain sensor (assuring equipment operability) from time response testing to calibration, use of actual data, and channel checks will not create any new accident initiators or scenarios. Periodic surveillance of these instruments will detect significant degradation in the sensor response characteristic. Implementation of the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed licensing basis change does not involve a significant reduction in margin of safety.

   The total Reactor Protective System and Engineered Safety Features Actuation System response time assumed in the safety analysis is not affected by this change. The periodic system response time verification method for selected pressure and differential pressure sensors is modified to allow the use of allocated data based on actual test results or other verifiable response time data. Verification methods and calibration tests assure that any degradation sufficient to significantly affect sensor response time will be detected before the total system response time exceeds that defined in the safety analysis. Therefore, it is concluded that the proposed change does not result in a significant reduction in margin with respect to plant safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC

staff proposes to determine that the amendments request involves no significant hazards consideration.

Attorney for licensee: Jay E. Silberg, Esquire, Shaw, Pittman, Potts and Trowbridge, 2300 N Street, NW., Washington, DC 20037.

NRC Section Chief: Marsha Gamberoni, Acting

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NRC Section Chief: Marsha Gamberoni, Acting

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