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*A Member of the
Constellation Energy Group*

April 18, 2000

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
Continued Use of Proposed Alternative ASME Code Edition for the Third Ten-
Year Inservice Inspection Interval

In Reference (a), Baltimore Gas and Electric Company (BGE) proposed using the 1998 American Society of Mechanical Engineers (ASME) Code, Section XI for the third ten-year inservice inspection (ISI) interval. Reference (a) also submitted a line-by-line comparison of the 1989 and 1998 editions of the ASME Code, Section XI. Reference (b) was submitted proposing an alternative to 10 CFR 50.55a(g)(4), that the third ten-year ISI interval for Units 1 and 2 begin on July 1, 1999 using the 1983 edition, summer 1983 addenda, of the ASME Code, Section XI for all Class 1, 2, and 3 components (all further citations of 1983 edition of ASME Code, Section XI include the summer 1983 addenda). The proposal requested continued use of the 1983 edition of the ASME Code, Section XI, at least through the Unit 1 spring 2000 refueling outage, and until such time as the Nuclear Regulatory Commission (NRC) completed their review of Reference (a).

In Reference (c), pursuant to 10 CFR 50.55a(a)(3)(i), the NRC staff authorized BGE's proposed alternative (Reference b), concluding that it provides an acceptable level of quality and safety.

In Reference (d), the NRC concluded that BGE's alternative to use the 1998 edition of the ASME Code, Section XI (except for subsections IWE and IWL) with limitations, modifications, and exceptions as defined in the safety evaluation, would provide an acceptable level of quality and safety and therefore, was authorized pursuant to 10 CFR 50.55a(a)(3)(i).

This letter requests continued use of the 1983 edition of the ASME Code, Section XI as an interim Code for the third ten-year inspection interval of Calvert Cliffs Units 1 and 2 for the duration not to exceed the end of the spring 2001 Unit 2 refueling outage. We will update our ASME Code, Section XI programs no later than the end of the spring 2001 Unit 2 refueling outage. The impetus of this request is to avert the potential hardship for BGE associated with implementing the required Written Practice for our non-destructive examination program and other scheduled activities dependent on the effective year of the

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ASME Code, Section XI. Furthermore, BGE requests that any inspections performed in the third ten-year ISI interval under the 1983 edition of the ASME Code, Section XI may be credited to the percentage requirements of the 1998 edition. During the 2001 Unit 2 refueling outage, we may perform some examinations that are required by the 1998 edition, but not by the 1983 edition. We understand that these examinations will be accredited for the 1998 edition, once it is implemented.

The continued use of the 1983 edition of the ASME Code, Section XI for the third ten-year ISI interval, for a duration no later than the end of the spring 2001 Unit 2 refueling outage, provides an adequate level of safety and quality.

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

Very truly yours,



CHC/ALS/dlm

cc:	R. S. Fleishman, Esquire	H. J. Miller, NRC
	J. E. Silberg, Esquire	Resident Inspector, NRC
	Director, Project Directorate I-1, NRC	R. I. McLean, DNR
	A. W. Dromerick, NRC	J. H. Walter, PSC

- REFERENCES:**
- (a) Letter from Mr. C. H. Cruse (BGE) to NRC Document Control Desk, dated January 29, 1999, "Proposed Alternate American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI Edition for Unit Nos. 1 and 2 Third Ten-Year Inservice Inspection Intervals"
 - (b) Letter from Mr. C. H. Cruse (BGE) to NRC Document Control Desk, dated June 16, 1999, "Proposed Alternate ASME Code Edition for the Third Ten-Year Inservice Inspection Interval"
 - (c) Letter from Mr. S. S. Bajwa (NRC) to Mr. C. H. Cruse (BGE), dated June 21, 1999, "Proposed Alternate American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Edition for the Third 10-Year Inservice Inspection Interval Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (TAC Nos. MA4647 and MA4648)"
 - (d) Letter from Ms. M. Gamberoni (NRC) to Mr. C. H. Cruse (BGE), dated April 5, 2000, "Safety Evaluation of Proposed Alternate American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Section XI, 1998 Edition for the Third 10-Year Inspection Interval – Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (TAC Nos. MA4647 and MA4648)"