



**Constellation
Nuclear**

**Calvert Cliffs
Nuclear Power Plant**

*A Member of the
Constellation Energy Group*

August 31, 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
Withdrawal of Accident Dose Analysis and Control Room Habitability Analyses

REFERENCES:

- (a) Letter from Mr. A. W. Dromerick (NRC) to Mr. C. H. Cruse (BGE), dated August 28, 1997, Extension of Control Room Habitability Analysis Submittal Date (TAC Nos. M99013 and M99014)
- (b) Letter from Mr. C. H. Cruse (BGE) to NRC Document Control Desk, dated April 9, 1998, Response to Request for Additional Information: Accident Dose Analysis and Control Room Habitability Analyses for the Maximum Hypothetical Accident, Fuel Handling Accident, and Control Element Assembly Ejection Event
- (c) Letter from Mr. C. H. Cruse (BGE) to NRC Document Control Desk, dated March 17, 1998, Response to Request for Additional Information: Control Room Habitability Analyses and Main Steam Line Break Analyses

Reference (a) requested that Control Room habitability analyses be performed for all appropriate accidents. Reference (b) provided the offsite and onsite dose consequences of a maximum hypothetical accident (MHA), fuel handling accident, and control element assembly ejection event. Reference (c) provided the offsite and onsite dose consequences of a main steam line break, seized rotor event, and steam generator tube rupture event. These analyses evaluate offsite doses and Control Room habitability for the MHA based on International Commission for Radiation Protection (ICRP)-30 dose conversion factors, ARCON96 generated atmospheric dispersion coefficients to the West Road inlet plenum, and a 3000 cfm Control Room inleakage.

A003

By this letter, we are withdrawing Reference (b) from your review. Our action is based on the following issues:

- While we have not yet agreed on the use of a methodology for performing Control Room habitability analyses, we are confident your efforts with the Nuclear Energy Institute (NEI) Control Room Habitability Task Force will establish a generic method to address Control Room habitability issues.
- When that generic approach is acceptable to NRC and NEI, we will submit analysis consistent with the requirements of our licensing basis.

In the interim, Control Room habitability requirements of our licensing basis are met by the operator's use of self-contained breathing apparatus and potassium iodide (KI) thyroid-blocking tablets.

In addition to withdrawing Reference (b), we are correcting a statement that it makes. On page two, we erroneously stated the Control Room doses must meet 10 CFR Part 50, Appendix A, General Design Criteria (GDC) – 19 limits. More correctly for a plant of our vintage and strictly in accordance with Chapter 1C of our Final Safety Analysis Report, Reference (b) should have stated we must meet the intent of proposed GDC-11 limits. While the dose limits are the same, we feel it is misleading to state that we comply with an GDC that was not formally adopted until after Units 1 and 2 were licensed and has not subsequently been made a part of our licensing basis.

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

Very truly yours,



CHC/JMO/bjd

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

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