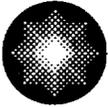


Charles H. Cruse
Vice President
Nuclear Energy

1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 495-4455



**Constellation
Nuclear**

**Calvert Cliffs
Nuclear Power Plant**

*A Member of the
Constellation Energy Group*

September 14, 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
License Amendment Request; Implementation of American Society of
Mechanical Engineers Boiler and Pressure Vessel Code Section XI,
Subsections IWE and IWL

Pursuant to 10 CFR 50.90, the Calvert Cliffs Nuclear Power Plant, Inc. hereby requests an Amendment to Renewed Operating License Nos. DPR-53 and DPR-69 by incorporation of the changes described below into the Technical Specifications for Calvert Cliffs Units 1 and 2.

On September 9, 1996, a final rule amending 10 CFR 50.55a was issued requiring owners to implement, by September 9, 2001, the requirements of the 1992 Edition through the 1992 Addenda of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code Section XI, Subsections IWE and IWL, as modified and supplemented by 10 CFR 50.55a. We have developed a program to effect the implementation of Subsections IWE and IWL. This submittal requests a license amendment in support of the program.

The Technical Specification change replaces the reference to Regulatory Guide 1.35 with a reference to Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, and deletes the applicability of Surveillance Requirement 3.0.2. Compliance with Regulatory Guide 1.35 is not sufficient to comply with 10 CFR 50.55a, as amended, and inspection frequencies will be in accordance with Subsection IWL of Section XI; therefore, Surveillance Requirement 3.0.2 will no longer apply. The final Technical Specification pages may be renumbered to accommodate added/deleted pages.

We have evaluated the significant hazards considerations associated with the change, as required by 10 CFR 50.92, and determined that there are none (see Attachment 2 for a complete discussion). Operation with the proposed amendment would not result in any significant change in the types or significant increases in the amounts of any effluents that may be released offsite, nor would it result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.232(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed amendment.

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September 14, 2000
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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

ATTACHMENT (1)

DESCRIPTION AND JUSTIFICATION OF PROPOSED CHANGE

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DESCRIPTION AND JUSTIFICATION OF PROPOSED CHANGE

BACKGROUND

In the Federal Register, dated August 8, 1996 (61 FR 41303), the Nuclear Regulatory Commission amended its regulations to incorporate, by reference, the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 1992 Edition, through the 1992 Addenda, Subsections IWE and IWL. Subsection IWE states the requirements for inservice inspection of Class MC (metallic containment components) and the metallic liner of Class CC (concrete containment components). Subsection IWL states the requirements for the inservice inspection of the concrete containments. The Calvert Cliffs Nuclear Power Plant (CCNPP) containment vessels are ungrouted, post-tensioned concrete structures with metallic liners and, therefore, Subsections IWE and IWL apply. Revising the inservice inspection program for the containment vessels to meet the requirements of 10 CFR 50.55a(f)(4) creates a conflict with the Technical Specifications that are applicable to the CCNPP containment vessels. We are submitting the requested change to the Technical Specifications, in accordance with 10 CFR 50.55a(f)(5)(ii), to resolve the conflicting issue. The requirements of 10 CFR 50.55a, with respect to the containment vessels, are incorporated in the program for containment inspection for the first and subsequent inspection intervals, as required by the ASME B&PV Code, Section XI, Subsections IWA, IWE, and IWL.

REQUESTED CHANGE

Change Technical Specification 5.5.6 to replace the reference to Regulatory Guide 1.35 with a reference to Section XI of the ASME B&PV Code, and delete the applicability of Surveillance Requirement 3.0.2. Technical Specification 5.5.6 is currently conducted in accordance with Regulatory Guide 1.35, Revision 2, 1976. Compliance with Regulatory Guide 1.35 is not sufficient to ensure compliance with 10 CFR 50.55a, as amended. The concrete containment tendon surveillance program will be conducted using the containment inspection program, developed in accordance with Subsection IWL of the ASME B&PV code, as required by 10 CFR 50.55a. The inspection frequencies will be in accordance with Subsection IWL of Section XI and, therefore, Surveillance Requirement 3.0.2 will no longer apply.

SAFETY ANALYSIS

The revision to the Technical Specifications will allow implementation of a containment inspection program utilizing the more robust inspection techniques required by incorporating, by reference, the requirements of ASME B&PV Code, Section XI, 1992 Edition, through the 1992 Addenda of Subsection IWL into the Technical Specifications.

The proposed change does not involve modifications to any system, structure, or component. The change is to ensure compliance with 10 CFR 50.55a by modifying the Technical Specifications to reference the requirements of the ASME B&PV Code, Section XI, 1992 Edition, through the 1992 Addenda of Subsection IWL, as modified and supplemented by 10 CFR 50.55a. The Containment Buildings are passive safety structures designed to prevent the release of radioactive materials to the environment. The Containment Buildings are not analyzed as causal factors in accidents involving the loss of radioactive material from the reactor coolant system.

Containment building integrity is essential to the containment function. Periodic inspections and tests of containment integrity ensure the maintenance of this integrity.

CONCLUSION

We request that the Nuclear Regulatory Commission grant our proposed amendment to the CCNPP Technical Specifications. The proposed change allows full compliance with 10 CFR 50.55a. The Plant Operations and Safety Review Committee and the Offsite Safety Review Committee have determined that the proposed change does not result in undue risk to the public health and safety.

ATTACHMENT (2)

DETERMINATION OF SIGNIFICANT HAZARDS

ATTACHMENT (2)
DETERMINATION OF SIGNIFICANT HAZARDS

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed changes have been evaluated against the standards in 10 CFR 50.92 and have been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendments:

1. *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The Containment Building is a passive safety structure that prevents the release of radioactive materials to the environment in post-accident conditions. The proposed Technical Specification change updates requirements of the Technical Specifications that have been made obsolete by the improvements of the Containment building inspections required by the changes in the regulations. The improved inspections required by the American Society of Mechanical Engineers Code serve to maintain containment response to accident conditions, by causing the identification and repair of defects in the Containment Buildings.

Relocating existing requirements, eliminating requirements that duplicate regulations, and making administrative improvements provide Technical Specifications that are easier to use. Because existing requirements are controlled by regulation, there is no reduction in commitment and adequate control is still maintained. Therefore, the proposed change would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

The Containment Building is a passive safety structure designed to contain radioactive materials released from the reactor coolant system. The performance of the Containment Building is not evaluated as the causal factor in any accident at Calvert Cliffs Nuclear Power Plant. The proposed Technical Specification change updates requirements of the Technical Specifications that were made obsolete by the improvements of the Containment building inspections required by the changes in the regulations. Revising the Technical Specifications, to comply with current regulations and to eliminate duplication of requirements, does not create the possibility of a new or different type of accident from any accident previously evaluated.

3. *Would not involve a significant reduction in a margin of safety.*

The safety function of the Containment Building is to provide a boundary to the release of radioactive material to the environment during post-accident conditions. The change to the Technical Specifications incorporate improved inspection techniques and criteria to ensure optimum containment integrity and, therefore, optimum containment response in the event of an accident resulting in a release of radioactive material from the reactor coolant system. Optimizing containment integrity will result in maintaining the margin of safety allowed by the Containment Buildings. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

ATTACHMENT (3)

UNITS 1 & 2
MARKED-UP TECHNICAL SPECIFICATION PAGE

5.0-12

5.5 Programs and Manuals

5.5.6 Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operation. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with ~~Regulatory Guide 1.35, Revision 2, 1976.~~

The provisions of ~~SR 3.0.2~~ and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of regulatory position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

5.5.8 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10CFR50.65a, as amended by relief granted in accordance with 10CFR50.55a(a)(3).