Docket No. 50-317

Mr. A. E. Lundvall, Jr. Vice President-Supply Baltimore Gas & Electric Company P. O. Box 1475 Baltimore, Maryland 21203

Dear Mr. Lundvall:

The Commission has issued the enclosed Exemption to certain requirements of 10 CFR 50.55a(q)(4) in response to your letters of March 6, 1984 and January 28, 1985. The exemption allows a common start date for inservice inspection and testing for Calvert Cliffs Units 1 and 2. A common start date would be achieved by extending the present Unit 1 program expiration date from May 8, 1985 to April 1, 1987.

Also enclosed is a copy of the "Environmental Assessment and Finding of No Significant Impact" which was published in the Federal Register on (50 FR 13893). April 8, 1985

Sincerely,

James R. Miller, Chief Operating Reactors Branch #3 Division of Licensing

Enclosures: Exemption Federal Register Notice

cc w/enclosures: See next page

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Calvert Cliffs

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of
BALTIMORE GAS AND ELECTRIC
COMPANY

Docket No. 50-317

(Calvert Cliffs Nuclear Power Plant Unit No. 1

EXEMPTION

I.

The Baltimore Gas and Electric Company (BG&E) is the holder of Facility Operating License No. DPR-53 which authorizes the operation of the Calvert Cliffs Nuclear Power Plant, Unit No. 1, at a steady-state power level not in excess of 2700 megawatts thermal. The facility utilizes a pressurized water reactor located in Calvert County, Maryland.

II.

10 CFR Part 50.55a requires that piping and components of boiling and pressurized water reactor plants be tested, examined and pressure tested to the requirements of Section XI of the ASME Code and that the examinations and tests be completed during each of four (4) ten-year intervals. These ten-year intervals are calculated from the start date of commercial operation of the facility.

10 CFR Part 50.55a(g)(4) requires that licensees update their inservice inspection (ISI) and inservice testing (IST) programs to a newer edition of Section XI of the Code each ten years. Since the regulations require these updates based on the 10-year anniversary of facility commercial operation,

multi-unit sites often find that each unit has an ISI and IST program structured for a slightly different edition of the Code.

III.

By letters dated March 6, 1984 and January 28, 1985, the licensee requested an exemption to the requirements of 10 CFR Part 50.55a(g)(4) which would allow the use of a common start date for ISI and IST for Calvert Cliffs Units 1 and 2. That common start date would be achieved by extending the termination date of the Unit 1 programs to coincide with the termination of the Unit 2 programs. The Unit 1 ISI and IST programs would be thus extended to terminate on April 1, 1987 rather than on May 8, 1985.

The Commission's staff has reviewed this request and has determined that a common ISI and IST start date for Calvert Cliffs Units 1 and 2 has inherent administrative, technical, and cost saving advantages, both for the licensee and the Commission. The staff has concluded that:

- The same Code edition and addenda, by regulation, can be used as the basis for the ISI and IST program for Calvert Cliffs Units 1 and 2;
- Since the units are similar in design, only one ISI and IST program would have to be written and submitted by the licensee;
- 3. The Commission's staff would have to review and approve only one ISI and one IST submittal instead of two of each; and
- 4. The change of the ISI date to April 1, 1987 will not affect the completion of examination and pressure test requirements for the inspection intervals.

Therefore, the staff concludes that the exemption request should be granted. If a common start date were not established, the ISI and IST programs would be accomplished, for some period of time, utilizing two different ASME Code editions. Although adminstratively possible, this situation could contribute to increased personnel errors in the performance of inspection and testing requirements to two different versions of the Code. This can create a substantial and additional administrative workload for what can be described as only nominal technical differences in the inspection and testing requirements.

IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12(a), the exemption requested by the licensees's letters of March 6, 1984 and January 28, 1985, is authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest. The Commission hereby grants to the licensee an exemption from the requirements of 10 CFR 50.55a(g)(4) as it relates to the 120-month inspection interval for inservice examination of components, inservice tests to verify operational readiness of pumps and valves, and system pressure tests.

Pursuant to CFR 51.32, the Commission has determined that the issuance of the exemption will have no significant impact on the environment (50 FR 13893).

This Exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Frank J. Miraglia, Jr., Deputy Director

Division of Licensing

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Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland this 18th day of April, 1985