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Docket Nos. 50-317 and 50-318

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

3-15-83

Dear Mr. Lundvall:

SUBJECT: EXEMPTION REQUEST OF FEBRUARY 23, 1983 - FIRE PROTECTION SCHEDULAR REQUIREMENTS OF 10 CFR 50.48(c) - CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2

In your letter dated February 23, 1983, you requested further schedular relief from 10 CFR 50.48(c) in regard to the installation of emergency lighting at Calvert Cliffs, Unit Nos. 1 and 2 as required by Section III.J of Appendix R. Specifically, you requested that the deadline for implementation of this requirement for both Units be extended to September 1, 1983.

In your exemption request you asked for additional time to complete the installation of the emergency lighting systems for both units and explained the circumstance and reasons that made the additional time necessary.

The Commission has granted your request as described in the enclosed Exemption. If the NRC should determine that this implementation date as granted by this Exemption is not met and no good cause can be shown for your failure to meet the date, you will be found in violation of 10 CFR 50.48(c).

A copy of the Exemption is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by
 DARRELL G. EISENHUT

Darrell G. Eisenhut, Director
 Division of Licensing

changes made 3/10/83

Please write me comment on p. 2 of Exemption (2nd copy)

CHEB
 v. Benaroyo

WS
 2/2/83

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Enclosure:
 Exemption

cc: See next page

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SURNAME	PMKreutzer	DJaffe	TWambach	RAClark	GCLamas	w. Shields	DEisenhut
DATE	3/3/83	3/2/83	3/2/83	3/3/83	3/4/83	3/9/83	3/1/83



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

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Docket No. 50-317/50-318

Docketing and Service Section
Office of the Secretary of the Commission

SUBJECT: BALTIMORE GAS AND ELECTRIC COMPANY, Clavert Cliffs Nuclear
Power Plant Unit Nos. 1 and 2

Two signed originals of the Federal Register Notice identified below are enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies () of the Notice are enclosed for your use.

- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- Notice of Availability of Applicant's Environmental Report.
- Notice of Proposed Issuance of Amendment to Facility Operating License.
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Other: EXEMPTION - Fire Protection

Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure:
As Stated

OFFICE →	ORB#3:DL					
SURNAME →	PMKreutzer/pr					
DATE →	3/15/83					

Baltimore Gas and Electric Company

cc:

James A. Biddison, Jr.
General Counsel
Baltimore Gas and Electric Company
P. O. Box 1475
Baltimore, MD 21203

George F. Trowbridge, Esquire
Shaw, Pittman, Potts and Trowbridge
1800 M Street, N. W.
Washington, D. C. 20036

Mr. R. C. L. Olson, Principal Engineer
Nuclear Licensing Analysis Unit
Baltimore Gas and Electric Company
Room 922 - G&E Building
P. O. Box 1475
Baltimore, MD 21203

Mr. Leon B. Russell
Plant Superintendent
Calvert Cliffs Nuclear Power Plant
Maryland Routes 2 & 4
Lusby, MD 20657

Bechtel Power Corporation
Attn: Mr. J. C. Ventura
Calvert Cliffs Project Engineer
15740 Shady Grove Road
Gaithersburg, MD 20760

Combustion Engineering, Inc.
Attn: Mr. R. R. Mills, Manager
Engineering Services
P. O. Box 500
Windsor, CT 06095

Mr. R. M. Douglass, Manager
Quality Assurance Department
Baltimore Gas & Electric Company
Fort Smallwood Road Complex
P. O. Box 1475
Baltimore, MD 21203

Mr. S. M. Davis, General Supervisor
Operations Quality Assurance
Calvert Cliffs Nuclear Power Plant
Maryland Routes 2 & 4
Lusby, MD 20657

Ms. Mary Harrison, President
Calvert County Board of County Commissioners
Prince Frederick, MD 20768

U. S. Environmental Protection Agency
Region III Office
Attn: Regional Radiation Representative
Curtis Building (Sixth Floor)
Sixth and Walnut Streets
Philadelphia, PA 19106

Mr. Ralph E. Architzel
Resident Reactor Inspector
NRC Inspection and Enforcement
P. O. Box 437
Lusby, MD 20657

Mr. Charles B. Brinkman
Manager - Washington Nuclear Operations
Combustion Engineering, Inc.
7910 Woodmont Avenue
Bethesda, MD 20814

Mr. J. A. Tiernan, Manager
Nuclear Power Department
Calvert Cliffs Nuclear Power Plant
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Mr. W. J. Lippold, Supervisor
Nuclear Fuel Management
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
P. O. Box 1475
Baltimore, Maryland 21203

Mr. R. E. Denton, General Supervisor
Training & Technical Services
Calvert Cliffs Nuclear Power Plant
Maryland Routes 2 & 4
Lusby, MD 20657

Administrator, Power Plant Siting Program
Energy and Coastal Zone Administration
Department of Natural Resources
Tawes State Office Building
Annapolis, MD 21204

Regional Administrator
Nuclear Regulatory Commission, Region I
Office of Executive Director for Operations
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subsection III.J specifies that emergency lighting units with at least an 8-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment in access and egress routes thereto.

Section 50.48(c) requires completion of all modifications to meet the provisions of Appendix R within a specified time from the effective date of this fire protection rule, February 17, 1981, except for modifications to provide alternative safe shutdown capability. On September 27, 1982, the NRC issued Supplement 3 to the Calvert Cliffs Fire Protection Safety Evaluation Report (FPSEER), dated September 14, 1979, which provided NRC approval of the licensee's Interactive Cable Analysis (ICA). This approval was required by the licensee in order to identify areas within Units 1 and 2 which require emergency lighting in accordance with 10 CFR Part 50, Appendix R, Subsection III.J. In accordance with 10 CFR 50.48(c)(4), these modifications are required to be completed within six (6) months of NRC approval if plant shutdown is not required. Since Supplement 3 to the FPSEER was issued on September 27, 1982, the associated modifications not requiring plant shutdown are required to be completed by March 27, 1983.

By application dated February 23, 1983, the licensee requested an exemption from the schedular requirements of 10 CFR 50.48(c)(4) in that the installation of emergency lighting, not requiring plant shutdown, could not be completed prior to September 1, 1983. By way of explanation, the licensee indicated in its application of February 23, 1983 that at the time of the September 27, 1982 FPSEER supplement, engineering and planning resources were heavily

committed to the imminent Unit No. 2 refueling outage, which commenced on October 16, 1982 and was completed on January 16, 1983. The licensee was not able to include any emergency lighting modification work in that outage interval, but did begin making the modifications after the completion of the outage.

III.

Based on our consideration of these circumstances, we conclude that the licensee made proper application of available resources in a best effort to provide the required emergency lighting. However, the time allowed proved to be insufficient to permit full implementation. In addition, we have determined that as an interim compensatory measure the existing emergency lighting in conjunction with the portable lighting units that are available for use by the operators and members of the fire brigade can provide emergency lighting as needed until the installation of the required units is achieved. On this basis, the staff has judged that the request for exemption to allow additional time to complete the installation of the emergency lighting for both units until September 1, 1983 should be granted.

IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, an exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest and hereby grants the following exemption with respect to the schedular requirements of 10 CFR Part 50, Subsection 50.48(c):

Extend the implementation date in paragraph (c)(4) for installation of modifications required by Appendix R, Subsection III.J for both units, that require prior NRC approval but not plant shutdown, from March 27, 1983 to September 1, 1983.

The NRC staff had determined that the granting of this Exemption will not result in any significant environmental impact and that pursuant to 10 CFR 51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with this action.

FOR THE NUCLEAR REGULATORY COMMISSION



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland
this 15th day of March, 1983.