

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

February 14, 1991

Docket No. 50-317

Mr. G. C. Creel Vice President - Nuclear Energy Baltimore Gas and Electric Company Calvert Cliffs Nuclear Power Plant MD Rts 2 & 4 Lusby, Maryland 20657

Dear Mr. Creel:

SUBJECT: ENVIRONMENTAL ASSESSMENT OF EXEMPTION REQUEST RELATING TO 10 CFR PART 50, APPENDIX J, PARAGRAPH III.D.3, TYPE C TESTS FOR THE CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 1 (TAC NO. 79460)

Enclosed is a copy of an "Environmental Assessment and Finding of No Significant Impact" for your information. This assessment relates to your request dated January 18, 1991.

You requested an exemption from the requirements of 10 CFR Part 50, Appendix J, Paragraph III.D.3, "Type C Tests." Type C tests are local leak rate tests (LLRTs) which are required for all containment isolation valves. The specific request is for a one-time extension from March 23, 1991, to June 21, 1991, from the requirement to perform a LLRT on containment isolation valve 1-CVC-515 which is located in a two-inch letdown line in the Chemical Volume and Control System (CVC). The last LLRT performed on the 1-CVC-515 containment isolation valve was in March of 1989. The above cited regulation requires that the type C tests be performed at intervals no greater than 2 years for all containment isolation valves. The 1-CVC-515 containment isolation valve LLRT was performed approximately three months earlier than the other unit's containment isolation valves due to maintenance being performed on the valve. The requested one-time extension for the LLRT on 1-CVC-515 will allow the valve to be LLRT with the rest of the Unit 1 containment isolation valves which come due in June of this year, thus, placing 1-CVC-515 LLRT interval back into sequence with the other containment isolation valves.

Your request is based on the fact that no modifications of any plant structures, systems, or components will be performed and there are no changes in the way the plant systems are operated. You further indicate that the requested one-time extension of the LLRT interval for 1-CVC-515 will not result in any increases in routine or post-accident radiological releases or occupational exposures. Details supporting your request and the staff's finding are included in the enclosed Environmental Assessment. The notice has been forwarded to the Office of the Federal Register for publication.

Sincerely,

Daniel G. McDonald, Senior Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Environmental Assessment

cc w/enclosure:
See next page

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Sincerely,

ORIGINAL SIGNED BY:

Daniel G. McDonald, Senior Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Environmental Assessment

cc w/enclosure:
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Mr. G. C. Creel Baltimore Gas & Electric Company

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## UNITED STATES NUCLEAR REGULATORY COMMISSION BALTIMORE GAS AND ELECTRIC COMPANY DOCKET NO. 50-317 ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from certain requirements of 10 CFR Part 50, Appendix J, Paragraph III.D.3, "Type C Tests," to the Baltimore Gas and Electric Company (BG&E/licensee) for the Calvert Cliffs Nuclear Power Plant, Unit 1, located at the licensee's site in Calvert County, Maryland.

## ENVIRONMENTAL ASSESSMENT

<u>Identification of Proposed Action</u>: The licensee would be exempt from the requirement of 10 CFR Part 50, Paragraph III.D.3, to the extent that a one-time extension from March 23, 1991, to June 21, 1991, (approximately three months) would be allowed for performing a type C local leak rate test (LLRT) on containment isolation valve 1-CVC-515 which is currently required at intervals no greater than 2 years. This requested extension will allow the valve to be LLRT with the rest of the Unit 1 containment isolation valves which are due for testing in June 1991, thus, placing 1-CVC-515 LLRT interval back into sequence with the rest of the Unit 1 containment isolation valves requiring LLRTs in accordance with the 2 year schedule of the above cited regulation.

The exemption is responsive to the licensee's application for exemption dated January 18, 1991.





The Need for the Proposed Action: Maintenance was performed on the valve in March of 1989 which resulted in the required LLRT being performed three months earlier than the other Unit 1 containment isolation valves which require the LLRTs in accordance with the schedule of the above cited regulation. This was initially considered acceptable by the licensee based on the schedule for the Unit 1 spring 1991 outage and projected startup of Unit 2. However, due to area electrical power needs, the Pennsylvania-New Jersey-Maryland (PJM) Network requested that the licensee not shut down Unit 1 until late in March. In addition, subsequent delays in the startup of Unit 2 would result in conflicts for the licensee's plant staff to provide optimal support for the initial startup process for Unit 2 and shutdown of Unit 1. The requested extension will provide the licensee flexibility to perform its Unit 1 outage tasks while also allowing for improved coordination of plant staff to support both units in a safe and efficient manner.

The proposed exemption constitutes approximately a three month delay in performing the Type C test (LLRT) on containment isolation valve 1-CVC-515. As noted, the extension will accommodate the current schedules for both units, allow the licensee flexibility to perform required tasks, and also allow for improved coordination of the plant staff to support activities of both units in a safe and efficient manner.

The required LLRTs have been performed in accordance with the required schedule specified in the regulations during previous planned outages. The initial planning and scheduling allowed for the 1-CVC-515 valve to be tested in the upcoming outage and returned to the same sequences as the other valves. However, the unanticipated supply requirements and schedule changes for both units have necessitated the one-time extension request. Based on past performance and existing circumstances, a good faith effort has been made.

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Environmental Impact of the Proposed Action: The proposed exemption will not change plant equipment, operation or procedures, and does not adversely affect either the probability or the consequences of any accident at this facility. The exemption does not affect radiological effluents from the facility or radiation levels at the facility. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed exemption.

The proposed exemption does not affect nonradiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed exemption.

<u>Alternative to the Proposed Action:</u> Since the Commission has concluded there are no measurable environmental impacts associated with the proposed exemption, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to the exemption would be to require rigid compliance with the schedular requirements of 10 CFR Part 50, Appendix J, Paragraph III.D.3, for performing the LLRT on containment isolation valve 1-CVC-515. Such action would not enhance the protection of the environment. <u>Alternative Use of Resources</u>: This action involves no use of resources not previously considered in the Final Environmental Statement of the Calvert Cliffs Nuclear Power Plant, Unit 1.

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<u>Agencies and Persons Consulted</u>: The NRC staff reveiwed the licensee's request and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT: The Commission has determined not to prepare an environmental impact statement for the proposed license amendment.

Based upon the foregoing environmental assessment, we conclude that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this action, see the licensee's letter dated January 18, 1991. This letter is available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C., and at the Calvert County Library, Prince Frederick, Maryland.

Dated at Rockville, Maryland, this 14th day of February 1991.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert a. Com

Robert A. Capra, Director Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation