Charles H. Cruse Vice President Nuclear Energy



Calvert Cliffs
Nuclear Power Plant

A Member of the Constellation Energy Group

February 12, 2001

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: Revision to Technical Specification 5.2.2.e,

"Organization - Unit Staff"

REFERENCES:

(a) Letter from C. H. Cruse (CCNPP) to Document Control Desk (NRC),

dated December 21, 2000, same subject

In Reference (a), we requested a change to Technical Specification 5.2.2.e to allow future changes to specific overtime limits and working hours to be controlled in accordance with the provisions of our established procedure control process. We noted in Reference (a) that our proposed change was consistent with NUREG-1434, "Standard Technical Specifications, Combustion Engineering Plants." However, we did not completely adopt the wording of Technical Specification Task Force (TSTF)–258, which provides additional controls beyond those stated in our original request. We wish to amend our original request to include the controls as stated in TSTF–258, Revision 3. The marked up Technical Specification page is attached and supercedes the one provided in Reference (a). This change to the Technical Specification markup does not change the No Significant Hazards Determination in Reference (a). The original No Significant Hazards Determination addressed the change from the controls of Generic Letter 82-12 to the use of procedural controls. The additional controls requested by this letter fall within the original request to adopt procedural controls.

A001

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

Very truly yours,

STATE OF MARYLAND

: TO WIT:

COUNTY OF CALVERT

I, Charles H, Cruse, being duly sworn, state that I am Vice President - Nuclear Energy, Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP), and that I am duly authorized to execute and file this License Amendment Request on behalf of CCNPP. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other CCNPP employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of _____, this <u>12th</u> day of *February* , 2001.

WITNESS my Hand and Notarial Seal:

CHC/PSF/bjd

My Commission Expires:

Attachment: **Technical Specification Marked-up Pages** (1)

R. S. Fleishman, Esquire cc:

J. E. Silberg, Esquire

Director, Project Directorate I-1, NRC

D. M. Skay, NRC

H. J. Miller, NRC

Resident Inspector, NRC

R. I. McLean, DNR

ATTACHMENT (1)

TECHNICAL SPECIFICATION MARKED-UP PAGES

5.0-3

ATTACHMENT (1)

TECHNICAL SPECIFICATION MARKED-UP PAGES

Technical Specification 5.2.2 (current wording)

e. The amount of overtime worked by unit staff members performing safety-related functions shall be limited and controlled in accordance with the Nuclear Regulatory Commission (NRC) Policy Statement on working hours (Generic Letter 82-12).

Delete the above wording and replace with:

e. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related-functions (e.g., licensed Senior Reactor Operators, licensed Reactor Operators, health physicists, auxiliary operators, and key maintenance personnel). The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or the Plant General Manager's designee, in accordance with approved administrative procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.