



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

January 15, 1992

Docket Nos. 50-317  
and 50-318

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, PARAGRAPHS III.D.2 AND III.D.3, TYPE B AND C TESTS FOR THE CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 (TAC NOS. M82212 AND M82213)

Enclosed is a copy of an "Environmental Assessment and Finding of No Significant Impact" for your information. This assessment relates to your request dated November 27, 1991.

You requested an exemption from the requirements of 10 CFR Part 50, Appendix J, Paragraphs III.D.2 and III.D.3, Type B Tests and Type C Tests. Type B and C tests are local leak rate tests (LLRT) which are required for all containment penetrations and isolation valves, respectively. The above-cited regulations requires that the Type B and C LLRT be performed at intervals no greater than 2 years. Each of these LLRT is also to be performed during reactor shutdown for refueling. Calvert Cliffs is currently operating on a 24-month refueling schedule. The NRC staff has recognized that the current 10 CFR Part 50 regulations could, in some cases, require a plant shutdown to perform Appendix J LLRT before the completion of a 24-month fuel cycle. Consequently, the NRC staff has issued Generic Letter (GL) 91-04 which provides guidance to licensees on the information needed to support an exemption from the requirements of 10 CFR Part 50, Appendix J. The requested exemption from 10 CFR Part 50, Appendix J, would allow the surveillance intervals for Type B and C LLRT to be performed at intervals no greater than 30 months.

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 extension of the LLRT interval will not result in any increases in routine or

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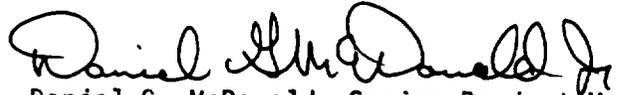
Mr. G. C. Creel

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January 15, 1992

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

Mr. G. C. Creel  
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 and 2

cc:

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Calvert County Board of  
Commissioners  
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UNITED STATES NUCLEAR REGULATORY COMMISSION  
BALTIMORE GAS AND ELECTRIC COMPANY  
DOCKET NOS. 50-317 AND 50-318  
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, Paragraphs III.D.2 and III.D.3, Type B Tests and Type C Tests, to the Baltimore Gas and Electric Company (BG&E/licensee) for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, located at the licensee's site in Calvert County, Maryland.

ENVIRONMENTAL ASSESSMENT Identification of Proposed Action: The licensee would be exempt from the requirements of 10 CFR Part 50, Paragraphs III.D.2 and III.D.3, to the extent that an extension would be allowed for performing Type B and C local leak rate tests (LLRT) on penetrations and containment isolation valves which are currently required to be tested at intervals no greater than 2 years. This requested extension would allow Type B and C LLRT to be performed at intervals no greater than 30 months.

The exemption is responsive to the licensee's application for exemption dated November 27, 1991.

The Need for the Proposed Action: The requirements of 10 CFR Part 50, Appendix J, paragraphs III.D.2 and III.D.3, indicate that Type B and C LLRT shall be performed during each reactor shutdown for refueling at intervals no greater than 2 years. However, in order to conform with the regulations, the licensee would have to enter a forced outage at Calvert Cliffs Unit 1 on February 28, 1992, although the next refueling outage is scheduled to begin on March 6, 1991.

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The NRC staff has recognized that the regulations do not accommodate longer fuel cycles, such as the 24-month fuel cycle currently in use at Calvert Cliffs, Units 1 and 2. Consequently, the NRC staff has issued Generic Letter (GL) 91-04 which provides guidance to licensees on how to prepare requests for exemption to the requirements of Appendix J.

The proposed exemption represents a 6-month maximum extension to the Type B and C LLRT interval currently required by 10 CFR Part 50, Appendix J, for containment penetrations and isolation valves. The proposed exemption would allow the licensee to perform the Type B and C LLRT on containment penetrations and isolation valves during the scheduled refueling outages for Calvert Cliffs, Units 1 and 2, and therefore avoid additional forced outages.

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 the radiation levels at the facility. The licensee has provided the results of previous LLRT performed at Calvert Cliffs, Units 1 and 2, and details relating to the methodology used in extrapolating the previous LLRT data to the proposed 30-month intervals. The requested exemption is also based on reducing the allowed combined leakage rate limit to increase the margin by 25 percent. The NRC staff has determined that these actions are consistent with the guidance provided in GL 91-04 and that the containment leakage rate would be maintained within acceptable limits with the LLRT interval increased to a maximum of 30 months. 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.

Alternative to the Proposed Action: 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 requirements of 10 CFR Part 50, Appendix J, Paragraphs III.D.2 and III.D.3, for performing the LLRT on Type B and C containment penetrations and isolation valves. Such action would not enhance the protection of the environment.

Alternative Use of Resources: This action involves no use of resources not previously considered in the Final Environmental Statement of the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2.

Agencies and Persons Consulted: The NRC staff reviewed 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 exemption.

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 November 27, 1991. This letter is available for public inspection

at the Commission's Public Document Room, 2120 L Street, NW., Washington,  
D.C., and at the Calvert County Library, Prince Frederick, Maryland.

Dated at Rockville, Maryland, this 15th day of January 1992.

FOR THE NUCLEAR REGULATORY COMMISSION

*Robert A. Capra*

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

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,

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:  
See next page

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