October 17, 1994

Mr. Robert E. Denton Vice President - Nuclear Energy Baltimore Gas and Electric Company Calvert Cliffs Nuclear Power Plant 1650 Calvert Cliffs Parkway Lusby, MD 20657-4702

ENVIRONMENTAL ASSESSMENT OF EXEMPTION REQUEST RELATING TO 10 CFR SUBJECT: PART 50, APPENDIX A, GENERAL DESIGN CRITERION 2, "DESIGN BASES FOR PROTECTION AGAINST NATURAL PHENOMENA," FOR CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 1 (TAC NO. M90170) AND UNIT NO. 2 (TAC NO. M90171)

Dear Mr. Denton:

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Enclosed is a copy of an "Environmental Assessment and Finding of No Significant Impact" for your information. This assessment relates to your request dated August 4, 1994.

You requested an exemption from the requirements of 10 CFR Part 50, Appendix A, General Design Criterion 2, "Design Bases For Protection Against Natural Phenomena." The exemption is temporary in that it is necessary to allow the upgrading of the Unit No. 2 emergency diesel generator (EDG). The exemption would permit temporary removal of a steel missile door, which not only provides protection to the out-of-service EDG being upgraded, but also provides protection to portions of the support systems of the other EDGs which are required to be operable to support the operation of Unit No. 1 and the shutdown or refueling of Unit No. 2.

This notice is being 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

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# UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

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October 17, 1994

Mr. Robert E. Denton Vice President - Nuclear Energy Baltimore Gas and Electric Company Calvert Cliffs Nuclear Power Plant 1650 Calvert Cliffs Parkway Lusby, MD 20657-4702

SUBJECT: ENVIRONMENTAL ASSESSMENT OF EXEMPTION REQUEST RELATING TO 10 CFR PART 50, APPENDIX A, GENERAL DESIGN CRITERION 2, "DESIGN BASES FOR PROTECTION AGAINST NATURAL PHENOMENA," FOR CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 1 (TAC NO. M90170) AND UNIT NO. 2 (TAC NO. M90171)

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Sincerely,

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

Docket Nos. 50-317 and 50-318

Enclosure: Environmental Assessment

cc w/encl: See next page

Robert E. Denton Baltimore Gas & Electric Company

cc:

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Mr. Hagner Mister, President Calvert County Board of Commissioners 175 Main Street Prince Frederick, MD 20678

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Jay E. Silberg, Esquire Shaw, Pittman, Potts and Trowbridge 2300 N Street, NW Washington, DC 20037

Mr. G. L. Detter, Director, NRM Calvert Cliffs Nuclear Power Plant 1650 Calvert Cliffs Parkway Lusby, MD 20657-47027

Resident Inspector c/o U.S. Nuclear Regulatory Commission P.O. Box 287 St. Leonard, MD 20685

Mr. Richard I. McLean Administrator - Radioecology Department of Natural Resources 580 Taylor Avenue Tawes State Office Building B3 Annapolis, MD 21401

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406 Calvert Cliffs Nuclear Power Plant Unit Nos. 1 and 2

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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 A, General Criterion 2, "Design Bases For Protection Against Natural Phenomena," to Baltimore Gas and Electric Company (the 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

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## Identification of Proposed Action:

The proposed exemption would allow relief from General Design Criterion 2 (GDC-2) during the upgrading of the Unit 2 emergency diesel generator (EDG) No. 21. The proposed exemption will permit the temporary removal of a steel missile door which provides missile protection for the No. 21 EDG, which will be out-of-service to allow for modifications which will increase its load capacity, and also provides missile protection to portions of the support systems for EDGs Nos. 11 and 12. EDGs Nos. 11 and 12 are required to be operable to support the operation of Unit 1 (Modes 1, 2, or 3). In addition, EDG No. 12 is a swing EDG and is required to be operable for Unit 2 when the unit is shutdown or in refueling (Mode 5 or 6).

The upgrading of the Unit 2 EDG will be performed during the upcoming Unit 2 refueling outage (RFO-10). RFO-10 is scheduled to commence on March 17, 1995, and be completed in late May 1995. The steel missile door will be required to be removed about four times during the outage. The licensee estimates that each of the removals will last for about 24 hours, which will result in a total removal time of about 100 hours during the scheduled 65 day RFO-10.

#### Need for the Proposed Action:

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The proposed temporary exemption is needed to permit the completion of highly desirable upgrade to the Unit 2 EDG No. 21 without requiring a dual unit shutdown.

#### Environmental Impacts of the Proposed Action:

The proposed exemption does not involve any measurable environmental impact during normal operation of Unit 1 or the shutdown/refueling of Unit 2 since the plant configuration is changed only minimally for short periods of time when the missile door will be removed and overall plant operation is not changed. The likelihood of tornado-generated or other high wind-generated missile damage during the time the exemption would be in effect and which could affect equipment required to be operable to avoid radiological impact is low. Also, the licensee indicates that the missile door will be reinstalled whenever severe weather conditions arise. Thus, the proposed temporary exemption would not significantly affect the probability or consequences of potential reactor accidents and would not otherwise affect radiological plant effluents. Consequently, the Commission concludes that there are no significant radiological impacts associated with the proposed exemption.

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With regard to potential nonradiological impacts, the proposed exemption involves features located entirely within the owner-controlled area defined in 10 CFR Part 20. The EDG upgrade project activities do not affect nonradiological plant effluents and has no other environmental impact. Therefore, the staff concludes that there are no significant nonradiological environmental impacts associated with the proposed exemption.

# <u>Alternatives to the Proposed Action:</u>

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The principal alternative to requesting the temporary exemption for implementation of the EDG upgrade would be to comply with the restrictive requirements of GDC-2. However, this alternative would not significantly enhance the protection of the environment, and would result in a significant loss of power generation since a dual unit outage would be required. Alternate Use of Resources:

This action does not involve the use of any resources not previously considered in the April 1973 Final Environmental Statements for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2.

# Agencies and Persons Consulted:

The NRC staff consulted the State of Maryland, Department of Natural Resources, regarding the environmental impact of this proposed action. The State of Maryland had no comments.

# FINDING OF NO SIGNIFICANT IMPACT

Based upon the foregoing environmental assessment, the staff concludes that the proposed action will not have a significant effect on the quality of the human environment and has determined, therefore, not to prepare an environmental impact statement for the proposed exemption.

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For further details with respect to this action, see the application dated August 4, 1994, which is available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW, Washington, DC 20555, and at the local public document room located at Calvert County Library, Prince Frederick, Maryland 20678.

Dated at Rockville, Maryland, this 17th day of October 1994.

FOR THE NUCLEAR REGULATORY COMMISSION

LB Marsh

Ledyard B. Marsh, Director Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

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