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January 22, 2003

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
Request for Additional Information Related to Revision of Technical
Specification 3.7.11 to Adopt Technical Specification Task Force-51

REFERENCES: (a) Letter from Mr. P. E. Katz (CCNPP) to Document Control Desk (NRC),
dated June 11, 2003, License Amendment Request: Revision to Technical
Specification 3.7.11
(b) Letter from Ms. D. M. Skay (NRC) to Mr. P. E. Katz (CCNPP), dated
December 11, 2002, Request for Additional Information Related to
Revision of Technical Specification 3.7.11 to Adopt Technical
Specification Task Force -51

Attachment (1) provides the information requested in Reference (b). This information supports and clarifies the information provided in Reference (a). This information does not affect the No Significant Hazards Consideration Determination or the Environmental Impact Review of Reference (a).

A001

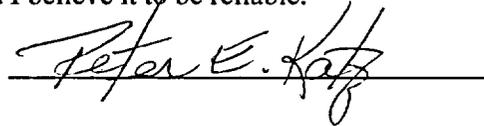
Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



STATE OF MARYLAND :
: TO WIT:
COUNTY OF CALVERT :

I, Peter E. Katz, being duly sworn, state that I am Vice President - 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 Calvert, this 22 day of January 2003.

WITNESS my Hand and Notarial Seal:


Notary Public

My Commission Expires:

2 / 1 / 2006
Date

PEK/PSF/bjd

Attachment: (1) Response to Request for Additional Information Related to Revision of Technical Specification 3.7.11 to Adopt Technical Specification Task Force-51

cc: J. Petro, Esquire
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)

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
RELATED TO REVISION OF TECHNICAL SPECIFICATION 3.7.11
TO ADOPT TECHNICAL SPECIFICATION TASK FORCE-51**

ATTACHMENT (1)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO REVISION OF TECHNICAL SPECIFICATION 3.7.11 TO ADOPT TECHNICAL SPECIFICATION TASK FORCE-51

Question:

The proposed changes to the Technical Specifications create an opportunity for a different release pathway than was previously assumed for a design basis fuel handling accident (FHA) in the spent fuel pool (SFP) area. This may increase the radiological consequences in the Control Room of the design basis FHA over that previously calculated, due to a difference in the atmospheric dispersion factor assumed for a release from that pathway.

With respect to Control Room habitability, does the intent of 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 19 continue to be met for the proposed changes to the Technical Specifications and the resulting change in the operation of the spent fuel pool exhaust ventilation system (SFPEVS) after an FHA in the SFP area, including reconstitution/inspection activities? How is this determined?

Response:

Technical Specification 3.7.11 requires that the SFPEVS be operable and in operation during movement of irradiated fuel assemblies in the Auxiliary Building. A calculation has been performed which defines the conditions to alter Technical Specification 3.7.11 to not require that the SFP filters be in operation or operable during fuel movement or reconstitution in the SFP after an appropriate amount of decay time. This calculated decay time is that required to compensate for the SFP filter credit post-FHA and for the decrease in decontamination factor during reconstitution activities. More specifically, each relevant isotopic quantity in the revised FHA calculation is less than the corresponding design basis isotopic quantity.

An FHA with 27 days of decay time post-shutdown and no filtration credit is less severe radiologically than an FHA with 100 hours of decay time post-shutdown and filtration credit. Thus after 27 days of decay, the requirements of Technical Specification 3.7.11 and the requirement of negative pressure in the SFP area are no longer necessary during fuel movement in the SFP.

An FHA with 32 days of decay time post-shutdown and no filtration credit is less severe radiologically than an FHA with 100 hours of decay time post-shutdown, a reconstitution decontamination factor of 64, and filtration credit. Thus after 32 days of decay, the requirements of Technical Specification 3.7.11 and the requirement of negative pressure in the SFP area are no longer necessary during fuel movement or reconstitution activities in the SFP.

The calculation supporting this effort does not specifically calculate Control Room or offsite doses. Since each isotopic value in the calculation is less than that in the design basis calculation, the design basis doses are more limiting.

As regards to the atmospheric dispersion coefficients, the offsite atmospheric dispersion coefficients remain unchanged. For the Control Room atmospheric dispersion coefficients, use of the design basis stack release values remains conservative, since the alternate ground release atmospheric dispersion coefficients are of smaller value.

ATTACHMENT (1)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
RELATED TO REVISION OF TECHNICAL SPECIFICATION 3.7.11
TO ADOPT TECHNICAL SPECIFICATION TASK FORCE-51

	Atmospheric Dispersion Coefficients	
	Ground Release	Stack Release
	sec/m ³	sec/m ³
0-8 hours	7.7E-4	8.6E-4
8-24 hours	4.5E-4	5.0E-4
1-4 days	2.5E-4	2.8E-4
4-30 days	6.3E-5	7.0E-5

Updated Final Safety Analysis Report Section 9.8.2.3 delineates the control room habitability results from an FHA in Containment. This was previously approved by the Nuclear Regulatory Commission. A similar analysis was performed for an FHA in the SFP with the SFP filters in operation.

Finally, the limiting FHA is that from an FHA in Containment with various doors open, and not in the SFP. Per Updated Final Safety Analysis Report Section 14.18, the offsite doses from the containment pathway are approximately three times those from the SFP pathway. This is because the containment accident has never credited filtration, while the SFP accident has credited filtration. By limiting the doses from a SFP accident to those crediting filtration in the SFP, the Control Room doses will not be altered. Use of the existing SFP atmospheric dispersion coefficients is conservative. The FHA for the containment accident pathway is unchanged and is still limiting by a large factor.

Question:

If an analysis of the control room habitability for the FHA in the SFP area has been performed in support of the license amendment request, provide the analysis assumptions, inputs, and results.

Response:

The calculation supporting this effort does not specifically calculate Control Room or offsite doses for the reasons described above. A number of the important assumptions are included in the above response.