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December 12, 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
License Amendment Request: Elimination of Post-Accident Sampling System (PASS) Sampling Requirements

The Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP) hereby requests an Amendment to its Renewed Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 and 2, respectively, with the submittal of the proposed changes to the Technical Specifications.

This change proposes to revise CCNPP Improved Technical Specifications to eliminate the requirements for having and maintaining the Post-Accident Sampling System. This change is being submitted in accordance with the provisions of 10 CFR 50.90 and is consistent with Nuclear Regulatory Commission approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in the Federal Register on October 31, 2000 as part of the Consolidated Line Item Improvement Process. As part of this License Amendment Request, CCNPP is making specific regulatory commitments as described in Attachment (1). The marked up Technical Specification pages are contained in Attachment (2) and the final typed pages are contained in Attachment (3).

This proposed change to the Technical Specifications and our determination of significant hazards have been reviewed by our Plant Operations and Safety Review Committee and Nuclear Safety Review Board, and they have concluded that implementation of these changes will not result in an undue risk to the health and safety of the public.

We request that this change be approved by October 1, 2004.

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, George Vanderheyden, 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 St. Mary's, this 12th day of December, 2003.

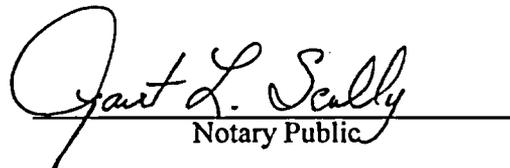
WITNESS my Hand and Notarial Seal:

My Commission Expires:

GV/PSF/bjd

- Attachments: (1) Description and Assessment
(2) Marked-up Technical Specification Pages
(3) Final Technical Specification Pages

cc: J. Petro, Esquire
J. E. Silberg, Esquire
Director, Project Directorate I-1, NRC
G. S. Vissing, NRC


Notary Public

March 25, 2007
Date

H. J. Miller, NRC
Resident Inspector, NRC
R. I. McLean, DNR

ATTACHMENT (1)

DESCRIPTION AND ASSESSMENT

ATTACHMENT (1)
DESCRIPTION AND ASSESSMENT

DESCRIPTION

The proposed license amendment deletes the program requirements of Technical Specification 5.5.3, "Post-Accident Sampling System (PASS)." The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366 (Reference 1). The availability of this Technical Specification improvement was announced in the *Federal Register* on October 31, 2000 as part of the Consolidated line Item Improvement Process (CLIIP) (Reference 2).

ASSESSMENT

Applicability of Published Safety Evaluation

Calvert Cliffs Nuclear Power Plant (CCNPP) has reviewed the safety evaluation published on October 31, 2000 as part of the CLIIP. This included a review of the NRC staffs' evaluation as well as the supporting information provided to support TSTF-366 (i.e., CE NPSD-1157-A, Technical Justification for the Elimination of the Post-Accident Sampling System from the Plant Design and Licensing Bases for CEOG Utilities, July 2000). Calvert Cliffs Nuclear Power Plant has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to CCNPP, and justify this amendment for the incorporation of the changes to the CCNPP Improved Technical Specifications. Any changes to the emergency plan needed to implement this amendment will be evaluated under 10 CFR 50.54(q) to determine if the change decreases the effectiveness of the site-specific plan.

Optional Changes and Variations

Calvert Cliffs Nuclear Power Plant is not proposing any variations or deviations from the Technical Specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

Requirements for installing and maintaining PASS were included in a confirmatory order for Calvert Cliffs issued on July 10, 1981. This amendment request includes superseding the requirements imposed by that confirmatory order.

REGULATORY ANALYSIS

No Significant Hazards Determination

Calvert Cliffs Nuclear Power Plant has reviewed the proposed no significant hazards consideration determination published as part of the CLIIP. Calvert Cliffs Nuclear Power Plant has concluded that the proposed determination presented in the notice is applicable to CCNPP and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Verification and Commitments

As discussed in the notice of availability published in *Federal Register* for this Technical Specification improvement, plant-specific commitments are as follows:

1. Calvert Cliffs Nuclear Power Plant will maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans are contained in plant procedures. Maintaining the contingency plans is considered a regulatory commitment.

ATTACHMENT (1)
DESCRIPTION AND ASSESSMENT

2. The capability for classifying fuel damage events at the Alert level threshold has been established for CCNPP. This capability is described in plant procedures. The capability for classifying fuel damage events is considered a regulatory commitment.
3. Calvert Cliffs Nuclear Power Plant has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in plant procedures. The capability to monitor radioactive iodines that have been released to offsite environs is considered a regulatory commitment.

ENVIRONMENTAL EVALUATION

Calvert Cliffs Nuclear Power Plant has reviewed the environmental evaluation included in the model safety evaluation published as part of the CLIIP. Calvert Cliffs Nuclear Power Plant has concluded that the staff's findings presented in that evaluation are applicable to CCNPP and the evaluation is hereby incorporated by reference for this application.

REFERENCES

1. Industry/TSTF Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a POST Accident Sampling System (PASS)"
2. Federal Register, Vol. 65, No. 211, "Notice of Availability for Referencing In License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process," dated October 31, 2000

ATTACHMENT (2)

MARKED-UP TECHNICAL SPECIFICATION PAGES

5.5 Programs and Manuals

Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Containment Spray, Safety Injection, and Chemical and Volume Control. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at least once per 24 months. The provisions of SR 3.0.2 are applicable.

Not Used

5.5.3 Post-Accident Sampling

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:~~

- ~~a. Training of personnel;~~
- ~~b. Procedures for sampling and analysis; and~~
- ~~c. Provisions for maintenance of sampling and analysis equipment.~~

ATTACHMENT (3)

FINAL TECHNICAL SPECIFICATION PAGES

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Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Containment Spray, Safety Injection, and Chemical and Volume Control. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at least once per 24 months. The provisions of SR 3.0.2 are applicable.

5.5.3 Not Used

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to

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be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination, in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 CFR Part 20, Appendix B, Table II, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas to be limited:
 1. During any calendar quarter: Less than or equal to 3 mrems to the total body, and to less than or equal to 10 mrems to any organ; and
 2. During any calendar year: Less than or equal to 6 mrems to the total body, and to less than or equal to 20 mrems to any organ;
- e. Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year, in accordance with the methodology and parameters in the ODCM, at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the Liquid Radwaste Treatment System to ensure that appropriate portions of this system are used to reduce releases of

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radioactivity when the projected doses to unrestricted areas exceeds 0.36 mrem to the total body, or 1.20 mrem to any organ in a 92-day period;

- g. Limitations on the functional capability and use of the Gaseous Radwaste Treatment System and the Ventilation Exhaust Treatment System to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the calculated doses to unrestricted areas exceeds 1.20 mrad for gamma radiation, and 2.40 mrad for beta radiation in a 92-day period;
- h. Limitations on the functional capability and use of the Ventilation Exhaust Treatment System to ensure that appropriate portions of this system are used to reduce releases of radioactivity when the calculated doses due to gaseous releases to unrestricted areas exceeds 1.8 mrem to any organ in a 92-day period;
- i. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary, to be limited:
 - 1. For noble gases: Less than or equal to 500 mrems/yr to the total body, and less than or equal to 3000 mrems/yr to the skin; and
 - 2. For Iodine-131 and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrems/yr to any organ;
- j. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents to areas beyond the site boundary, to be limited to:
 - 1. During any calendar quarter: Less than or equal to 10 mrad for gamma radiation, and less than or equal to 20 mrad for beta radiation; and

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2. During any calendar year: Less than or equal to 20 mrad for gamma radiation, and less than or equal to 40 mrad for beta radiation;
- k. Limitations on the annual and quarterly doses to a member of the public from Iodine-131 and all radionuclides in particulate form with half-lives greater than 8 days, in gaseous effluents released from each unit to areas beyond the site boundary, to be limited:
 1. During any calendar quarter: Less than or equal to 15 mrems to any organ;
 2. During any calendar year: Less than or equal to 30 mrems to any organ; and
 3. Less than 0.1% of the limits of 5.5.4.k(1) and (2) as a result of burning-contaminated oil; and
1. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity, and to radiation from uranium fuel cycle sources to be limited to less than or equal to 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the UFSAR, Section 4.1 cyclic and transient occurrences to ensure that components are maintained within the design limits.

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5.5.6 Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operation. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a, as amended by relief granted in accordance with 10 CFR 50.55a(a)(3).

The provisions of SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of regulatory position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

5.5.8 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following: