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February 23, 2004

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
Response to Request for Additional Information Concerning the License Amendment Request: Extension of Diesel Generator Required Action Completion Time (TAC Nos. MB8976 and MB8977)

REFERENCES:

(a) Letter from Mr. P. E. Katz (CCNPP) to Document Control Desk (NRC), dated May 12, 2003, License Amendment Request: Extension of Diesel Generator Required Action Completion Time

(b) Telephone Conference between Ms. D. J. Mitchell, et.al. (CCNPP) and Mr. G. S. Vissing, et.al. (NRC), on February 3, 2004, same subject

(c) Letter from Mr. G. Vanderheyden (CCNPP) to Document Control Desk (NRC), dated December 5, 2003, Response to Request for Additional Information Concerning the License Amendment Request: Extension of Diesel Generator Required Action Completion Time

In our letter dated May 12, 2003 (Reference a), we requested a License Amendment that would extend several Required Action Completion Times for inoperable Diesel Generators (DGs). This letter provides the information requested in Reference (b). This information does not change the conclusions of the No Significant Hazards Consideration Determination or the Environmental Impact Review provided in Reference (a).

One of the proposed Technical Specification changes requested in Reference (a) involves Required Action Completion Time 3.8.1.E.5 for declaring the Control Room Emergency Ventilation System (CREVS), Control Room Emergency Temperature System (CRETS), and H_2 Analyzer trains inoperable when the safety-related back-up power supply (DG) is inoperable. The original request was to extend the current 72 hours to 21 days when a single DG is inoperable (i.e., 0C DG is available and three other safety-related DGs are operable) before the CREVS, CRETS, and H_2 Analyzer trains are declared inoperable. We are revising the proposed Technical Specification change to extend the current 72 hours to 14 days when a single DG is inoperable before the CREVS, CRETS, and H_2 Analyzer trains are declared inoperable.

A001

An additional proposed Technical Specification change (Technical Specification 3.8.1 Condition I) involves the condition when both DGs dedicated to redundant safety-related equipment are inoperable. The original request was to extend the current Required Action Completion Time of 2 hours to 12 hours. We are withdrawing this proposed change.

In our letter dated December 5, 2003 (Reference c), we provided a list of compensatory actions that will be taken when utilizing the 14-day DG Completion Time for Condition B. We are adding the following compensatory action:

- The condition of the grid will be evaluated prior to entering the extended DG 3.8.1 Condition B Completion Time for elective maintenance. An extended DG Completion Time will not be entered to perform elective maintenance when grid stress conditions are considered "High" per our procedures. This will include conditions such as extreme summer temperatures and/or high demand.

The information provided in this letter results in changes to the original marked-up Technical Specification pages. Therefore, this letter also provides a complete set of revised marked-up Technical Specification pages (see Attachment 1) and new final pages (see Attachment 2). Please replace Reference (a) Attachments (3) and (4) with the Attachments to this letter.

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, Kevin J. Nietmann, being duly sworn, state that I am Plant General Manager - 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 23 day of February, 2004.

WITNESS my Hand and Notarial Seal:

Laura A. Martin
Notary Public

My Commission Expires: 9/1/2006

2/23/2004
Date

KJN/DJM/bjd

Attachments: (1) Marked-up Technical Specification Pages
(2) Final Technical Specification Pages

cc: J. Petro, Esquire
J. E. Silberg, Esquire
R. J. Laufer, NRC
G. S. Vissing, NRC
H. J. Miller, NRC
Resident Inspector, NRC
R. I. McLean, DNR

ATTACHMENT (1)

MARKED-UP TECHNICAL SPECIFICATION PAGES

3.8.1-2

3.8.1-3

3.8.1-4

3.8.1-5

3.8.1-6

3.8.1-7

3.8.1-8

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One required LCO 3.8.1.a offsite circuit inoperable.	A.1	Perform SR 3.8.1.1 or SR 3.8.1.2 for required OPERABLE offsite circuits.	1 hour AND Once per 8 hours thereafter
	AND		
	A.2	Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.	24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)
	AND		
	A.3	Restore required offsite circuit to OPERABLE status.	72 hours AND 17 ~~6~~ days from discovery of failure to meet LCO 3.8.1.a or LCO 3.8.1.b

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One LCO 3.8.1.b DG inoperable. INSERT 1	B.1.2 Perform SR 3.8.1.1 or SR 3.8.1.2 for the OPERABLE required offsite circuit(s).	1 hour AND Once per 8 hours thereafter
	AND	
	B.1.3 Declare required feature(s) supported by the inoperable DG inoperable when its redundant required feature(s) is inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	AND	
	B.3.1 Determine OPERABLE DG(s) is not inoperable due to common cause failure.	24 hours
	OR	
	B.3.2 Perform SR 3.8.1.3 for OPERABLE DG(s).	24 hours
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.5 Restore DG to OPERABLE status.	~~72 hours~~ 14 days AND 17 ~~8~~ days from discovery of failure to meet LCO 3.8.1.a or LCO 3.8.1.b
D. LCO 3.8.1.c offsite circuit inoperable.	---------- NOTE ---------- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems-Operating," when Condition D is entered with no AC power source to a train. ---------- D.1 Perform SR 3.8.1.1 or SR 3.8.1.2 for required OPERABLE offsite circuit(s). AND	1 hour AND Once per 8 hours thereafter

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D (continued)	D.2 Declare, CREVS, CRETS, or H_2 Analyzer with no offsite power available inoperable when the redundant CREVS, CRETS, or H_2 Analyzer is inoperable.	24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)
	AND	
	D.3 Declare CREVS, CRETS, and H2 Analyzer supported by the inoperable offsite circuit inoperable.	72 hours
E LCO 3.8.1.c DG inoperable.	---------- NOTE ---------- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems-Operating," when Condition A is entered with no AC power source to a train. ----------	E
Insert 3	E.1 Perform SR 3.8.1.1 or SR 3.8.1.2 for the OPERABLE required offsite circuit(s).	1 hour
	AND	AND
		ONCE One per 8 hours thereafter
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
~~D.~~ E. (continued)	~~D.2~~ E.3 Declare CREVS, CRETS, or H_2 Analyzer supported by the inoperable DG inoperable when the redundant CREVS, CRETS, or H_2 Analyzer is inoperable.	4 hours from discovery of Condition ~~D~~ E concurrent with inoperability of redundant required feature(s)
	AND	
	~~D.3~~.1 E.4 Determine OPERABLE DG(s) is not inoperable due to common cause failures.	24 hours
	OR	
	~~D.3~~ E.4 .2 Perform SR 3.8.1.3 for OPERABLE DG(s).	24 hours
	AND	
	~~D.4~~ E.5 Declare CREVS, CRETS, and H_2 Analyzer supported by the inoperable DG inoperable.	~~72 hours~~ 14 days

INSERT 4

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. or G. Two required LCO 3.8.1.a offsite circuits inoperable. OR One required LCO 3.8.1.a offsite circuit that provides power to the CREVS, CRETS, and H_2 Analyzer inoperable and the required LCO 3.8.1.c offsite circuit inoperable.	F or G.1 Declare required feature(s) inoperable when its redundant required feature(s) is inoperable. AND F or G.2 Restore one required offsite circuit to OPERABLE status.	12 hours from discovery of Condition F or G concurrent with inoperability of redundant required feature(s) 24 hours
F or H One required LCO 3.8.1.a offsite circuit inoperable. AND One LCO 3.8.1.b DG inoperable.	---------- NOTE ---------- Enter applicable Conditions and Required Actions of LCO 3.8.9, when Condition F or H is entered with no AC power source to any train. ---------- F or H.1 Restore required offsite circuit to OPERABLE status. OR F or H.2 Restore DG to OPERABLE status.	 12 hours 12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
Two LCO 3.8.1.b DGs inoperable. OR LCO 3.8.1.b DG that provides power to the CREVS, CRETS, and H_2 Analyzer inoperable and LCO 3.8.1.c DG inoperable.	B.1 Restore one DG to OPERABLE status.	2 hours
Required Action and associated Completion Time of Condition A, B, E, F, or G not met.	H.1 Be in MODE 3. AND H.2 Be in MODE 5.	6 hours 36 hours
Three or more required LCO 3.8.1.a and LCO 3.8.1.b AC sources inoperable.	J.1 Enter LCO 3.0.3.	Immediately

INSERT 1

CONDITION	REQUIRED ACTION	COMPLETION TIME
	B.1 Verify both DGs on the other unit OPERABLE and 0C DG available. AND	1 hour AND Once per 24 hours thereafter

INSERT 2

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Required Action B.1 not met.	C.1.1 Restore both DGs on the other unit to OPERABLE status and 0C DG to available status. OR C.1.2 Restore DG to OPERABLE status.	72 hours

INSERT 3

CONDITION	REQUIRED ACTION	COMPLETION TIME
	E.1 Verify both LCO 3.8.1.b DGs OPERABLE, the other unit's DG OPERABLE and the 0C DG available. AND	1 hour AND Once per 24 hours thereafter

INSERT 4

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Required Action and associated Completion Time of Required Action E.1 not met.	F.1.1 Restore both LCO 3.8.1.b DGs and other unit's DG to OPERABLE status and 0C DG to available status. OR F.1.2 Restore DG to OPERABLE status.	72 hours

ATTACHMENT (2)

FINAL TECHNICAL SPECIFICATION PAGES

Section 3.8.1

Calvert Cliffs Nuclear Power Plant, Inc.
February 23, 2004

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources-Operating

LCO 3.8.1 The following AC electrical sources shall be OPERABLE:

a. Two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System;

b. Two diesel generators (DGs) each capable of supplying one train of the onsite Class 1E AC Electrical Power Distribution System; and

c. One qualified circuit between the offsite transmission network and the other unit's onsite Class 1E AC electrical power distribution subsystems needed to supply power to the Control Room Emergency Ventilation System (CREVS), Control Room Emergency Temperature System (CRETS), and H_2 Analyzer and one DG from the other unit capable of supplying power to the CREVS, CRETS, and H_2 Analyzer.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required LCO 3.8.1.a offsite circuit inoperable.	A.1 Perform SR 3.8.1.1 or SR 3.8.1.2 for required OPERABLE offsite circuits.	1 hour AND Once per 8 hours thereafter
	AND	
	A.2 Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.	24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)
	AND	
	A.3 Restore required offsite circuit to OPERABLE status.	72 hours AND 17 days from discovery of failure to meet LCO 3.8.1.a or LCO 3.8.1.b

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. One LCO 3.8.1.b DG inoperable.	B.1	Verify both DGs on the other unit OPERABLE and OC DG available.	1 hour AND Once per 24 hours thereafter
	AND		
	B.2	Perform SR 3.8.1.1 or SR 3.8.1.2 for the OPERABLE required offsite circuit(s).	1 hour AND Once per 8 hours thereafter
	AND		
	B.3	Declare required feature(s) supported by the inoperable DG inoperable when its redundant required feature(s) is inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	AND		
	B.4.1	Determine OPERABLE DG(s) is not inoperable due to common cause failure. OR	24 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. (continued)	B.4.2	Perform SR 3.8.1.3 for OPERABLE DG(s).	24 hours
	AND		
	B.5	Restore DG to OPERABLE status.	14 days AND 17 days from discovery of failure to meet LCO 3.8.1.a or LCO 3.8.1.b
C. Required Action and associated Completion Time of Required Action B.1 not met.	C.1.1	Restore both DGs on the other unit to OPERABLE status and OC DG to available status.	72 hours
		OR	
	C.1.2	Restore DG to OPERABLE status.	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. LCO 3.8.1.c offsite circuit inoperable.	---------- NOTE ---------- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems-Operating," when Condition D is entered with no AC power source to a train. ----------	
	D.1 Perform SR 3.8.1.1 or SR 3.8.1.2 for required OPERABLE offsite circuit(s).	1 hour AND Once per 8 hours thereafter
	AND	
	D.2 Declare, CREVS, CRETS, or H_2 Analyzer with no offsite power available inoperable when the redundant CREVS, CRETS, or H_2 Analyzer is inoperable.	24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)
	AND	
	D.3 Declare CREVS, CRETS, and H2 Analyzer supported by the inoperable offsite circuit inoperable.	72 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. LCO 3.8.1.c DG inoperable.	---------- NOTE ---------- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems-Operating," when Condition E is entered with no AC power source to a train. ----------	
	E.1 Verify both LCO 3.8.1.b DGs OPERABLE, the other unit's DG OPERABLE and the OC DG available.	1 hour AND Once per 24 hours thereafter
	AND	
	E.2 Perform SR 3.8.1.1 or SR 3.8.1.2 for the OPERABLE required offsite circuit(s).	1 hour AND Once per 8 hours thereafter
	AND	
	E.3 Declare CREVS, CRETS, or H_2 Analyzer supported by the inoperable DG inoperable when the redundant CREVS, CRETS, or H_2 Analyzer is inoperable.	4 hours from discovery of Condition E concurrent with inoperability of redundant required feature(s)
	AND	

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
E. (continued)	E.4.1	Determine OPERABLE DG(s) is not inoperable due to common cause failures. OR	24 hours
	E.4.2	Perform SR 3.8.1.3 for OPERABLE DG(s).	24 hours
	AND		
	E.5	Declare CREVS, CRETS, and H_2 Analyzer supported by the inoperable DG inoperable.	14 days
F. Required Action and associated Completion Time of Required Action E.1 not met.	F.1.1	Restore both LCO 3.8.1.b DGs and other unit's DG to OPERABLE status and OC DG to available status. OR	72 hours
	F.1.2	Restore DG to OPERABLE status.	

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
G. Two required LCO 3.8.1.a offsite circuits inoperable. OR One required LCO 3.8.1.a offsite circuit that provides power to the CREVS, CRETS, and H_2 Analyzer inoperable and the required LCO 3.8.1.c offsite circuit inoperable.	G.1 Declare required feature(s) inoperable when its redundant required feature(s) is inoperable. AND G.2 Restore one required offsite circuit to OPERABLE status.	12 hours from discovery of Condition G concurrent with inoperability of redundant required feature(s) 24 hours
H. One required LCO 3.8.1.a offsite circuit inoperable. AND One LCO 3.8.1.b DG inoperable.	---------- NOTE ---------- Enter applicable Conditions and Required Actions of LCO 3.8.9, when Condition H is entered with no AC power source to any train. ---------- H.1 Restore required offsite circuit to OPERABLE status. OR H.2 Restore DG to OPERABLE status.	 12 hours 12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. Two LCO 3.8.1.b DGs inoperable. OR LCO 3.8.1.b DG that provides power to the CREVS, CRETS, and H_2 Analyzer inoperable and LCO 3.8.1.c DG inoperable.	I.1 Restore one DG to OPERABLE status.	2 hours
J. Required Action and associated Completion Time of Condition A, B, C, E, F, G, H, or I not met.	J.1 Be in MODE 3. AND J.2 Be in MODE 5.	6 hours 36 hours
K. Three or more required LCO 3.8.1.a and LCO 3.8.1.b AC sources inoperable.	K.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

----------NOTE----------
SR 3.8.1.1 through SR 3.8.1.15 are only applicable to LCO 3.8.1.a and LCO 3.8.1.b AC sources. SR 3.8.1.16 is only applicable to LCO 3.8.1.c AC sources.

	SURVEILLANCE	FREQUENCY
SR 3.8.1.1	----------NOTE---------- Only required to be performed when SMECO is being credited for an offsite source. ---------- Verify correct breaker alignment and indicated power availability for the 69 kV SMECO offsite circuit.	Once within 1 hour after substitution for a 500 kV offsite circuit AND 8 hours thereafter
SR 3.8.1.2	Verify correct breaker alignment and indicated power availability for each required 500 kV offsite circuit.	7 days

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.3	---------- NOTES ---------- 1. Performance of SR 3.8.1.9 satisfies this Surveillance Requirement. 2. All DG starts may be preceded by an engine prelube period and followed by a warmup period prior to loading. 3. A modified DG start involving idling and gradual acceleration to synchronous speed may be used for this Surveillance Requirement as recommended by the manufacturer. When modified start procedures are not used, the voltage and frequency tolerances of SR 3.8.1.9 must be met. ----------	
	Verify each DG starts and achieves steady state voltage $\geq$ 4060 V and $\leq$ 4400 V, and frequency $\geq$ 58.8 Hz and $\leq$ 61.2 Hz.	31 days

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.8.1.4	---------- NOTES ---------- 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients below the load limit do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This Surveillance Requirement shall be preceded by and immediately follow without shutdown a successful performance of SR 3.8.1.3 or SR 3.8.1.9. ---------- Verify each DG is synchronized and loaded, and operates for ≥ 60 minutes at a load ≥ 4000 kW for DG 1A and ≥ 2700 kW for DGs 1B, 2A, and 2B.	31 days
SR 3.8.1.5	Verify each day tank contains ≥ 325 gallons of fuel oil for DG 1A and ≥ 275 gallons of fuel oil for DGs 1B, 2A, and 2B.	31 days
SR 3.8.1.6	Check for and remove accumulated water from each day tank.	31 days
SR 3.8.1.7	Verify the fuel oil transfer system operates to automatically transfer fuel oil from storage tank[s] to the day tank.	31 days

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.8.1.8	Verify interval between each sequenced load block is within ± 10% of design interval for the load sequencer.	31 days
SR 3.8.1.9	----------NOTE---------- All DG starts may be preceded by an engine prelube period. ---------- Verify each DG starts from standby condition and achieves, in ≤ 10 seconds, voltage > 4060 V and frequency > 58.8 Hz, and after steady state conditions are reached, maintains voltage ≥ 4060 V and ≤ 4400 V and frequency of > 58.8 Hz and ≤ 61.2 Hz.	184 days
SR 3.8.1.10	Verify manual transfer of AC power sources from the normal offsite circuit to the alternate offsite circuit.	24 months
SR 3.8.1.11	----------NOTE---------- Momentary transients outside the load and power factor limits do not invalidate this test. ---------- Verify each DG, operating at a power factor of ≤ 0.85, operates for ≥ 60 minutes while loaded to ≥ 4000 kW for DG 1A and ≥ 3000 kW for DGs 1B, 2A, and 2B.	24 months
SR 3.8.1.12	Verify each DG rejects a load ≥ 500 hp without tripping.	24 months

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.13	Verify that automatically bypassed DG trips are automatically bypassed on an actual or simulated required actuation signal.	24 months
SR 3.8.1.14	Verify each DG: a. Synchronizes with offsite power source while loaded upon a simulated restoration of offsite power; b. Manually transfers loads to offsite power source; and c. Returns to ready-to-load operation.	24 months

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.8.1.15	----------NOTE---------- All DG starts may be preceded by an engine prelube period. ----------	
	Verify on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated Engineered Safety Feature actuation signal: a. De-energization of emergency buses; b. Load shedding from emergency buses; c. DG auto-starts from standby condition and: 1. energizes permanently connected loads in ≤ 10 seconds, 2. energizes auto-connected emergency loads through load sequencer, 3. maintains steady state voltage ≥ 4060 V and ≤ 4400 V, 4. maintains steady state frequency of ≥ 58.8 Hz and ≤ 61.2 Hz, and 5. supplies permanently connected and auto-connected emergency loads for ≥ 5 minutes.	24 months

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.8.1.16	For the LCO 3.8.1.c AC electrical sources, SR 3.8.1.1, SR 3.8.1.2, SR 3.8.1.3, SR 3.8.1.5, SR 3.8.1.6, and SR 3.8.1.7 are required to be performed.	In accordance with applicable Surveillance Requirements