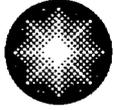


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February 25, 2004

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  
License Amendment Request: Revision to the Implementation Date for  
Cooldown Rates for Pressure Temperature Limits

**REFERENCE:** (a) Letter from G. S. Vissing (NRC) to G. Vanderheyden (CCNPP), dated  
December 9, 2003, Amendment Re: Revisions of Cooldown Rates for  
Reactor Pressure Vessel Pressure-Temperature Limits (TAC Nos. MB9472  
and MB9473)

Pursuant to 10 CFR 50.90, Calvert Cliffs Nuclear Power Plant, Inc. hereby requests an amendment to Renewed Operating License Nos. DPR-53 and DPR-69 to extend the implementation date for Amendments Nos. 261 and 238 for Calvert Cliffs Units 1 and 2, respectively (Reference a). The extension is requested to July 1, 2004. The present implementation schedule requires implementation of the amendments by April 7, 2004.

The basis and significant hazards consideration for this proposed change are provided in Attachment (1). This request has been discussed with our Nuclear Regulatory Commission Project Manager.

This proposed change 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 the proposed change will not result in an undue risk to the health and safety of the public.

We request that this change be approved before April 7, 2004. This is the current implementation date of Amendment Nos. 261 and 238.

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**ATTACHMENT (1)**

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**TECHNICAL BASIS AND  
SIGNIFICANT HAZARDS CONSIDERATION**

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**TABLE OF CONTENTS**

- 1.0 INTRODUCTION
- 2.0 DESCRIPTION
- 3.0 BACKGROUND
- 4.0 REGULATORY REQUIREMENTS
- 5.0 TECHNICAL ANALYSIS
- 6.0 SIGNIFICANT HAZARDS CONSIDERATION
- 7.0 ENVIRONMENTAL CONSIDERATION
- 8.0 PRECEDENCE
- 9.0 REFERENCES

## ATTACHMENT (1)

### TECHNICAL BASIS AND SIGNIFICANT HAZARDS CONSIDERATION

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#### 1.0 INTRODUCTION

Calvert Cliffs Nuclear Power Plant proposes to extend the implementation period associated with Amendment Nos. 261 and 238 from 120 days (April 7, 2004) to July 1, 2004. The approved amendment (Reference 1) changes the reactor pressure vessel pressure-temperature limit cooldown rates for Units 1 and 2. Because the planning period needed to effectively implement this amendment for the 2004 refueling outage had passed in the fall of 2003, we requested an extended implementation period (Reference 2). However, the approval for the amendment was issued earlier than expected and the 120 day requested extension did not allow implementation after the start of the 2004 refueling outage.

#### 2.0 DESCRIPTION

We request that the implementation period noted in Item 3 of Amendment Nos. 261 and 238 be revised from 120 days to July 1, 2004. This item now reads, "The license amendment is effective as of the date of issuance and shall be implemented within 120 days." The requested wording is, "This license amendment is effective as of the date of issuance and shall be implemented by July 1, 2004."

#### 3.0 BACKGROUND

Amendment Nos. 261 and 238 were approved and issued by the Nuclear Regulatory Commission (NRC) on December 9, 2003. These amendments revise the reactor pressure vessel pressure-temperature limit cooldown rates for both Units 1 and 2. These amendments were issued in response to our license amendment request dated May 28, 2003 (Reference 3), as supplemented by a letter dated November 25, 2003 (Reference 2). Due to the extensive nature of the changes needed to implement this amendment, we recognized last fall that our planning horizon for changes of this nature had closed. It would be difficult to implement these changes prior to the 2004 refueling outage. We therefore requested (in Reference 2) an extended implementation period. We discussed the need for the extended implementation and our desire to implement this change after the start of the 2004 refueling outage with our NRC Project Manager. The amendment was issued on December 9, 2003 and the 120 days implementation period expires on April 7, 2004, just prior to the beginning of our 2004 refueling outage. The initial extended implementation period (120 days) does not allow adequate time to incorporate this change prior to the 2004 refueling outage.

The changes to the reactor pressure vessel pressure-temperature limit cooldown rates that were approved are more conservative than our existing rates and result in a longer cooldown period. The existing cooldown rates are acceptable through the end of 2004. These cooldown rates are referenced extensively throughout the operating procedures, including emergency and abnormal operating procedures. Therefore, we desire an additional extended implementation period due to the extensive procedural changes needed, necessary operator training required and the refueling outage schedule impacts that are necessary because of the extended cooldown period that will be required.

Subsequent discussions with our NRC Project Manager indicated that a letter request was needed to change the implementation date. That request (Reference 4) was submitted on February 3, 2004. Upon receipt of our request, we were informed that a license amendment was needed to request an implementation change. Therefore, we are requesting such a change in this proposed amendment.

#### 4.0 REGULATORY REQUIREMENTS

We could find no published regulatory requirements or guidance on revising the implementation period associated with license amendments. Verbal guidance from the NRC Project Manager for this situation is that an amendment request is the only way to extend this implementation period and that the request must be approved prior to the end of the original 120 day implementation period.

## ATTACHMENT (1)

### TECHNICAL BASIS AND SIGNIFICANT HAZARDS CONSIDERATION

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#### 5.0 TECHNICAL ANALYSIS

As noted in Reference (3) the existing reactor pressure vessel pressure-temperature limit cooldown rates are non-conservative over the life of the plant. However, as noted in Reference (3), they remain valid through the end of 2004. Therefore, there is no technical issue with implementing the change after the 2004 outage. The proposed date of July 1, 2004 is well within the time that the existing cooldown rates remain acceptable.

#### 6.0 SIGNIFICANT HAZARDS CONSIDERATION

We have determined whether or not a Significant Hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92 as described below.

1. *involve a significant increase in the probability or consequences of an accident previously evaluated; or*

The proposed amendment extends the implementation period specified in Item 3 of Amendment Nos. 261 and 238 from 120 days to July 1, 2004. Since the existing reactor pressure vessel pressure-temperature limit cooldown rates are valid through the end of 2004, there is no technical or safety issue associated with this request. The proposed amendment is purely administrative.

Therefore, the proposed change does not involve a significant increase in the probability or consequence of an accident previously evaluated

2. *create the possibility of a new or different type of accident from any accident previously evaluated; or*

The proposed amendment extends the implementation period specified in Item 3 of Amendment Nos. 261 and 238 from 120 days to July 1, 2004. Since the existing reactor pressure vessel pressure-temperature limit cooldown rates are valid through the end of 2004, there is no technical or safety issue associated with this request. The proposed amendment is purely administrative.

This request does not involve a change in the operation of the plant and no new accident initiation mechanism is created by the proposed change. The proposed change does not involve a physical alteration of the plant.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. *involve a significant reduction in a margin of safety.*

The margin of safety is maintained during the period of extended implementation because the existing reactor pressure vessel pressure-temperature limit cooldown rates are valid through to end of 2004.

The proposed amendment extends the implementation period specified in Item 3 of Amendment Nos. 261 and 238 from 120 days to July 1, 2004. Since the existing reactor pressure vessel pressure-temperature limit cooldown rates are valid through the end of 2004, there is no technical or safety issue associated with this request. The proposed amendment is purely administrative.

Therefore, this proposed change does not significantly reduce the margin of safety.

## ATTACHMENT (1)

### TECHNICAL BASIS AND SIGNIFICANT HAZARDS CONSIDERATION

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#### 7.0 ENVIRONMENTAL CONSIDERATION

We have determined that operation with the proposed amendment will not result in any significant change in the types or significant increases in the amounts of any effluents that may be released offsite, and no significant increases in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed amendment.

#### 8.0 PRECEDENCE

Susquehanna Steam Electric Station – approved October 29, 2001

Ft. Calhoun Station – submitted February 6, 2004

#### 9.0 REFERENCES

- (1) Letter from G. S. Vissing (NRC) to G. Vanderheyden (CCNPP), dated December 9, 2003, Amendment Re: Revisions of Cooldown Rates for Reactor Pressure Vessel Pressure-Temperature Limits (TAC Nos. MB9472 and MB9473)
- (2) Letter from G. Vanderheyden (CCNPP) to Document Control Desk (NRC), dated November 25, 2003, License Amendment Request: Revision to Technical Specification P-T Curves
- (3) Letter from P. E. Katz (CCNPP) to Document Control Desk (NRC), dated May 28, 2003, License Amendment Request: Revision to Technical Specification P-T Curves
- (4) Letter from G. Vanderheyden (CCNPP) to Document Control Desk (NRC), dated February 3, 2004, Revisions of Cooldown Rates for Reactor Pressure Vessel Pressure Temperature Limits (TAC Nos. MB9472 and MB9473)