George Vanderheyden Vice President

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March 26, 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

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 March 23, 2004, same subject
- (c) Letter from Mr. K. J. Nietmann (CCNPP) to Document Control Desk (NRC), dated February 23, 2004, Response to Request for Additional Information Concerning the License Amendment Request: Extension of Diesel Generator Required Action Completion Time (TAC Nos. MB8976 and MB8977)

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).

During the telephone conference (Reference b), the NRC staff questioned the delta core damage frequency (CDF) and delta large early release frequency (LERF) results provided in Attachment (1) of Reference (a). The NRC staff requested we provide the Risk Metric Results for the delta CDF and delta

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LERF assuming the 0C Diesel Generator ventilation system modification is in place. These results are provided below.

Diel Matria	Risk Met	ric Results
NISK WELL	Unit 1	Unit 2
Delta CDF	2.6E-7	9.6E-8
Delta LERF	1.1E-8	3.7E-9

It should be noted that the modification on the 0C Diesel Generator ventilation system was installed for the sole purpose of reducing the risks associated with our request to extend the Diesel Generator Required Action Completion Times (Reference a).

During pre-implementation review, we determined that the original marked-up Technical Specification Condition J does not match the discussion in Reference (a). Changes to the original marked-up Condition J are necessary so that it reflects and supports the extension of the DG Required Action Completion Times requested in Reference (a) as modified by Reference (c). Attachment (1) contains the revised, marked-up Condition J. Attachment (2) contains new final pages that reflect the revised Condition J.

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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** 

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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 if to be reliable.

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of St. Maryland, this Hard day of March, 2004.

WITNESS my Hand and Notarial Seal:

My Commission Expires:

GV/DJM/bjd

Attachments: (1) Marked-up Technical Specification Page

(2) Final Technical Specification Pages

cc: J. Petro, Esquire

J. E. Silberg, Esquire

Director, Project Directorate I-1, NRC

G. S. Vissing, NRC

H. J. Miller, NRC

Resident Inspector, NRC

R. I. McLean, DNR

# ATTACHMENT (1)

MARKED-UP TECHNICAL SPECIFICATION PAGE

3.8.1-8

SUNITORS	(continued)
ACTIONS	(Continueu)

ACTIO	NS (continued)		* .	
	CONDITION		REQUIRED ACTION	COMPLETION TIME
(A.)	Two LCO 3.8.1.b DGs inoperable.		Restore one DG to OPERABLE status.	2 hours
	<u>OR</u>			
	LCO 3.8.1.b DG that provides power to the CREVS, CRETS, and H <sub>2</sub> Analyzer inoperable and LCO 3.8.1.c DG inoperable.			
T.	Time of Condition A,	XX1 AND	Be in MODE 3.	6 hours
<u> </u>	M, N, Y, F, S G, not HORT	<b>M</b> 2	Be in MODE 5.	36 hours
(k)	Three or more required LCO 3.8.1.a and LCO 3.8.1.b AC sources inoperable.	)1 (x)	Enter LCO 3.0.3.	Immediately

Required Action and associated Completion Time of Required Action 6.2, B.3, B.4.1, B.4.2, or B,5 Not met.

Required Action and associated Completion Time of Required Action E.A, E.3, E.4.1, E.4.2, or E.5 Not met.

CALVERT CLIFFS - UNIT 1 CALVERT CLIFFS - UNIT 2

3.8.1-8

Amendment No. 227 Amendment No. 201

#### ATTACHMENT (2)

# FINAL TECHNICAL SPECIFICATION PAGES

3.8.1-9

3.8.1-10

# ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
I.	Two LCO 3.8.1.b DGs inoperable.	1.1	Restore one DG to OPERABLE status.	2 hours
	<u>OR</u>			
	LCO 3.8.1.b DG that provides power to the CREVS, CRETS, and H₂ Analyzer inoperable and LCO 3.8.1.c DG inoperable.			
J.	associated Completion Time of Condition A, C, F, G, H, or I not	J.1	Be in MODE 3.	6 hours
		AND		
		J.2	Be in MODE 5.	36 hours
	<u>OR</u>			
	Required Action and associated Completion Time of Required Action B.2, B.3, B.4.1, B.4.2, or B.5 not met.		•	
	<u>OR</u>			
	Required Action and associated Completion Time of Required Action E.2, E.3, E.4.1, E.4.2, or E.5 not met.		· ,	,

#### ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
К.	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	1

#### SURVEILLANCE REQUIREMENTS

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.a and sources.

	FREQUENCY	
SR 3.8.1.1	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