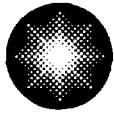


**George Vanderheyden**  
Vice President  
Calvert Cliffs Nuclear Power Plant  
Constellation Generation Group, LLC

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Lusby, Maryland 20657  
410.495.4455  
410.495.3500 Fax



**Constellation Energy**

December 1, 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  
Application for Technical Specification Improvement to Eliminate Requirements  
to Provide Monthly Operating Reports and Occupational Radiation Exposure  
Reports

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In accordance with the provisions of 10 CFR 50.90, Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP) is submitting a request for an amendment to the Technical Specifications for Calvert Cliffs Units 1 and 2.

The proposed amendment would delete Technical Specification requirements to submit monthly operating reports and the annual occupational radiation exposure report. The change is consistent with Nuclear Regulatory Commission-approved Revision 1 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this Technical Specification improvement was announced in the Federal Register on June 3, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

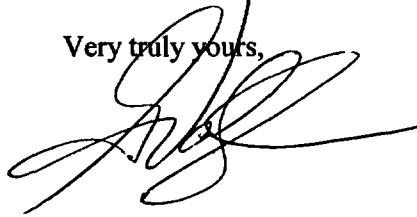
Attachment (1) provides a description of the proposed change and confirmation of applicability. Attachment (2) provides the existing Technical Specification pages marked-up to show the proposed change.

We request approval of the proposed license amendment as soon as possible, but not later than July 1, 2005. Earlier approval will allow us to achieve the stated regulatory burden reduction sooner.

A001

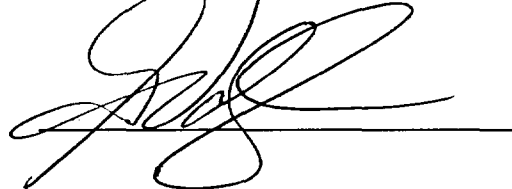
Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



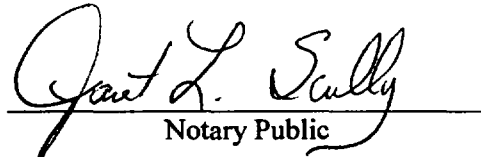
STATE OF MARYLAND :  
: TO WIT:  
COUNTY OF CALVERT :

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 1st day of December, 2004.

WITNESS my Hand and Notarial Seal:



Notary Public

My Commission Expires:

March 25, 2007  
Date

GV/CAN/bjd

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

cc: J. Petro, Esquire  
J. E. Silberg, Esquire  
R. V. Guzman, NRC

S. J. Collins, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR

**ATTACHMENT (1)**

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**DESCRIPTION AND ASSESSMENT**

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**TABLE OF CONTENTS**

- 1.0 INTRODUCTION
- 2.0 PROPOSED CHANGE
- 3.0 TECHNICAL ANALYSIS
- 4.0 REGULATORY ANALYSIS
- 5.0 NO SIGNIFICANT HAZARDS CONSIDERATION
- 6.0 ENVIRONMENTAL CONSIDERATION
- 7.0 PRECEDENT
- 8.0 REFERENCE

**ATTACHMENT (1)**  
**DESCRIPTION AND ASSESSMENT**

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**1.0 INTRODUCTION**

The proposed license amendment deletes the requirements in Technical Specification 5.6.1 for an annual report on occupational radiation exposures and Technical Specification 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this Technical Specification improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

**2.0 PROPOSED CHANGE**

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed Technical Specification changes include:

Technical Specification 5.6.1	Occupational Radiation Exposure Report	Deleted
Technical Specification 5.6.4	Monthly Operating Reports	Deleted

Note that we are not renumbering the Technical Specifications following removal of these reporting requirements. The marked up Technical Specification pages are contained in Attachment (2).

**3.0 TECHNICAL ANALYSIS**

We have reviewed the safety evaluation published on June 23, 2004 (69 FR 35067) as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's safety evaluation and the information provided to support TSTF-369, Revision 1. We have concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Calvert Cliffs Nuclear Power Plant, Units 1 and 2 and justify this amendment for the incorporation of the changes to the CCNPP Technical Specification.

**4.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369, Revision 1.

As discussed in the model safety evaluation published in the Federal Register on June 23, 2004 (69 FR 35067) for this Technical Specification improvement, we are making the following regulatory commitment:

1. Provide to the NRC, using an industry database, the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems [monthly operating reports and CDE]).

The model Safety Evaluation also contained a commitment for stations with both boiling and pressurized water reactors, and for stations with both operating and shutdown reactors. Calvert Cliffs Nuclear Power

**ATTACHMENT (1)**  
**DESCRIPTION AND ASSESSMENT**

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Plant does not have different reactor types or both operating and shutdown reactors at our site. Therefore, we are not adopting the associated commitment.

**5.0 NO SIGNIFICANT HAZARDS CONSIDERATION**

We have reviewed the proposed No Significant Hazards Consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIP. We have 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).

**6.0 ENVIRONMENTAL CONSIDERATION**

We have reviewed the environmental evaluation included in the model safety evaluation published on June 23, 2004 (69 FR 35067) as part of the CLIP. We have 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.

**7.0 PRECEDENT**

This application is being made in accordance with the CLIP. We are not proposing variations or deviations from the Technical Specification changes described in TSTF-369, Revision 1 or the NRC staff's model safety evaluation published on June 23, 2004 (69 FR 35067).

**8.0 REFERENCE**

Federal Register Notice published June 23, 2004 (69 FR 35067): "Notice of Availability of Model Application Concerning Technical Specifications Improvement to Elimination Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process."

**ATTACHMENT (2)**

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**MARKED UP TECHNICAL SPECIFICATION PAGES**

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**v**

**5.6-1**

**5.6-3**

TABLE OF CONTENTS

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5.5.16	Containment Leakage Rate Testing Program .....	5.5-23	
5.6	Reporting Requirements .....	5.6-1	
5.6.1	<del>Occupational Radiation Exposure Report .....</del>	<del>5.6-1</del>	<i>Deleted</i>
5.6.2	Annual Radiological Environmental Operating report .	5.6-1	
5.6.3	Radioactive Effluent Release Report .....	5.6-2	
5.6.4	<del>Monthly Operating Reports .....</del>	<del>5.6-3</del>	<i>Deleted</i>
5.6.5	CORE OPERATING LIMITS REPORT (COLR) .....	5.6-3	
5.6.6	Not Used .....	5.6-9	
5.6.7	Post-Accident Monitoring Report .....	5.6-9	
5.6.8	Tendon Surveillance Report .....	5.6-9	
5.6.9	Steam Generator Tube Inspection Report .....	5.6-9	

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 ~~Occupational Radiation Exposure Report~~ Deleted.

-----NOTE-----  
A single submittal may be made for both units, but shall not include the occupational radiation exposure from the Independent Spent Fuel Storage Installation. The submittal should combine sections common to both units at the station.  
-----

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures > 100 mrem/yr and their associated man rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, electronic personal dosimeter, or thermoluminescent dosimeter. Small exposures totaling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions. The report shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

-----NOTE-----  
A single submittal may be made for both units. The submittal should combine sections common to both units at the station.  
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The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results



5.6 Reporting Requirements

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5.6.4

~~Monthly Operating Reports~~ Deleted.

~~Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

5.6.5

CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

- 3.1.1 SHUTDOWN MARGIN
- 3.1.3 Moderator Temperature Coefficient
- 3.1.4 CEA Alignment
- 3.1.6 Regulating Control Element Assembly Insertion Limit
- 3.2.1 Linear Heat Rate
- 3.2.2 Total Planar Radial Peaking Factor
- 3.2.3 Total Integrated Radial Peaking Factor
- 3.2.5 AXIAL SHAPE INDEX
- 3.3.1 RPS Instrumentation - Operating
- 3.9.1 Boron Concentration

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

1. CENPD-199-P, "C-E Setpoint Methodology: C-E Local Power Density and DNB LSSS and LCO Setpoint Methodology for Analog Protection Systems"
2. CEN-124(B)-P, "Statistical Combination of Uncertainties Methodology Part 1: C-E Calculated Local Power Density and Thermal Margin/Low Pressure LSSS for Calvert Cliffs Units I and II"