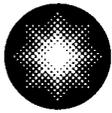


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Constellation Energy
Generation Group

May 2, 2007

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: Add LCO 3.0.9 on the Unavailability of Barriers
Using the Consolidated Line Item Improvement Process

REFERENCE: (a) Notice of Availability of Model Application Concerning Technical Specification Improvement to Modify Requirements Regarding the Addition of LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process, 71 FR 58444, dated October 3, 2006

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 modify Technical Specification requirements for unavailable barriers by adding Limiting Condition for Operation 3.0.9. This proposed amendment request is based on the Nuclear Regulatory Commission staff's model application described in Reference (a). Attachment (1) provides a description of the proposed change, the requested confirmation of applicability and plant specific regulatory commitments. Attachment (2) provides the marked up Technical Specification pages. The Technical Specification Bases will be changed as appropriate to support this information.

Safety Committee Review

The Plant Operations Review Committee has reviewed the proposed change and concurs that operation with the proposed change will not result in an undue risk to the health and safety of the public.

Schedule

Calvert Cliffs requests approval of the proposed License Amendment by April 1, 2008. We request an implementation period of 60 days to allow for operator training and the required procedure changes.

A001

ATTACHMENT (1)

**TECHNICAL BASIS AND
NO SIGNIFICANT HAZARDS CONSIDERATION**

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ATTACHMENT (1)

TECHNICAL BASIS AND NO SIGNIFICANT HAZARDS CONSIDERATION

1.0 DESCRIPTION

The proposed amendment would modify Technical Specification requirements for unavailable barriers by adding Limiting Condition for Operation 3.0.9.

The changes are consistent with the Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF)-427, Revision 2. The availability of this Technical Specification improvement was published in the Federal Register on October 3, 2006 (71 FR 58444) as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Calvert Cliffs Nuclear Power Plant (Calvert Cliffs) has reviewed the safety evaluation dated October 3, 2006 as part of the CLIIP. The review included a review of the NRC Staff's evaluation as well as the supporting information provided to support TSTF-427, Revision 2. Calvert Cliffs has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Calvert Cliffs Units 1 and 2 and justify this amendment request for incorporation of the proposed changes into the Calvert Cliffs Technical Specifications.

2.2 Optional Changes and Variations

Calvert Cliffs is not proposing any variations or deviations from the Technical Specification changes described in TSTF-427, Revision 2 or the NRC staff's model safety evaluation dated October 3, 2006.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Calvert Cliffs has reviewed the proposed No Significant Hazards Determination published in the Federal Register as part of the CLIIP. Calvert Cliffs has concluded that the proposed No Significant Hazards Determination presented in the Federal Register notice is applicable to Calvert Cliffs and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on October 3, 2006 for this Technical Specification improvement, plant specific regulatory commitments are made as follows:

1. Calvert Cliffs commits to the guidance of NUMARC 93-01, Section 11, which provides guidance and details on the assessment and management of risk during maintenance.
2. Calvert Cliffs will revise procedures as appropriate to ensure that the risk assessment and management process described in Nuclear Energy Institute (NEI) 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall Configuration Risk Management Program to ensure that potentially risk significant configurations resulting from maintenance and other operational activities are identified and avoided.

4.0 ENVIRONMENTAL EVALUATION

Calvert Cliffs has reviewed the environmental evaluation included in the model safety evaluation dated October 3, 2006 as part of the CLIIP. We have concluded that the NRC Staff's findings presented in that evaluation are applicable to Calvert Cliffs and the evaluation is hereby incorporated by reference for this

ATTACHMENT (1)

TECHNICAL BASIS AND NO SIGNIFICANT HAZARDS CONSIDERATION

application. A Technical Specification Bases Control Program already exists in the Calvert Cliffs Technical Specifications (Technical Specification 5.5.14).

ATTACHMENT (2)

MARKED UP TECHNICAL SPECIFICATION PAGES

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7

Special test exception (STE) LCOs in each applicable LCO section allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8 [Reserved]

LCO 3.0.9 Inset 1

Insert 1

When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.