J. M. Heffley
Chief Nuclear Officer

Constellation Energy Nuclear Generation Group, LLC
1997 Annapolis Exchange Parkway
Suite 310
Annapolis, MD 21401
410-897-5020

Constellation Energy
Nuclear Generation Group

October 17, 2007

U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: **Calvert Cliffs Nuclear Power Plant**
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Application for Technical Specification Change to Add LCO 3.0.8 on the Inoperability of Snubbers 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 Limiting Condition for Operation 3.0.8 on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process (70FR23252, May 4, 2005)

Pursuant to 10 CFR 50.90, Calvert Cliffs Nuclear Power Plant (Calvert Cliffs) and R.E. Ginna Nuclear Power Plant (Ginna) hereby request an amendment to Calvert Cliffs Renewed Operating Licenses DPR-53 and DPR-69 and Ginna Renewed Operating License DPR-18. This proposed license amendment will modify Technical Specification requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8, in accordance with Reference (a).

Attachment (1) provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. A summary of regulatory commitments is contained in Attachment (2). The proposed changes are shown in Attachments (3) and (4). The final Technical Specification pages will be renumbered to accommodate the insertion of this change.

We request approval of this change by April 1, 2008 to coincide with the Ginna spring outage. We also request an implementation period of 60 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the proper New York and Maryland state officials.

A001

NRR

Should you have any questions regarding the information in this submittal, please contact Mr. L. S. Larragoite at (410) 897-5087 or Louis.S.Larragoite @constellation.com.

Very truly yours,

John M. Heffley
Chief Nuclear Officer

STATE OF MARYLAND :
: **TO WIT**
COUNTY OF ANNE ARUNDEL :

I, John M. Heffley, state that I am Chief Nuclear Officer, Constellation Energy Nuclear Generation Group, LLC, for Calvert Cliffs Nuclear Power Plant, Inc. and R. E. Ginna Nuclear Power Plant, LLC, and that I am duly authorized to execute and file this response on behalf of these companies. 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 employees and/or consultants of the companies. 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 Anne Arundel, this 17 day of October, 2007.

JAMES E. RZEPKOWSKI
Notary Public-Maryland
Anne Arundel County
My Commission Expires
August 01, 2009

WITNESS my Hand and Notarial Seal:

Notary Public

My Commission Expires: 10/17/2007
Date

Attachments:
(1) Background and Analysis
(2) Regulatory Commitments
(3) Calvert Cliffs Nuclear Power Plant Technical Specification Markup
(4) R.E. Ginna Nuclear Power Plant Technical Specification Markup

cc: D. V. Pickett, NRC
S. J. Collins, NRC
Resident Inspector, NRC
R. I. McLean, DNR
J. P. Spath, NYSERDA
P. Eddy, NYS Dept. of Public Services

ATTACHMENT (1)

BACKGROUND AND ANALYSIS

Constellation Generation Group
October 17, 2007

BACKGROUND

The proposed amendment would modify Technical Specification requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) Standard Technical Specification change, TSTF-372-A, Revision 4. The availability of this Technical Specification improvement was published in the Federal Register on May 4, 2005 as part of the Consolidated Line Item Improvement Process (CLIIP).

ANALYSIS

Applicability of Published Safety Evaluation

We have reviewed the safety evaluation dated May 4, 2005 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the information provided to support TSTF-372-A. 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 (Calvert Cliffs), Units 1 and 2 and R.E. Ginna Nuclear Power Plant (Ginna) and justify this amendment for the incorporation of the changes to the Technical Specifications.

Optional Changes and Variations

We are not proposing any variations or deviations from the Technical Specification changes described in TSTF-372-A, Revision 4 or the NRC staff's model safety evaluation dated April 26, 2005.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

We have reviewed the proposed no significant hazards consideration determination published in the Federal Register as part of the CLIIP. We have concluded that the proposed determination is applicable to Calvert Cliffs and Ginna and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

VERIFICATION AND COMMITMENTS

A Technical Specification basis for LCO 3.0.8 that provides guidance and details on how to use the new requirements will be established by Calvert Cliffs and Ginna. The basis will also state that, while the industry and NRC guidance on implementation of 10 CFR 50.65(a)(4) – the Maintenance Rule – does not address seismic risk, LCO 3.0.8 should be considered with respect to other plant maintenance activities and integrated into the existing Maintenance Rule process to the extent possible. The effect of this integration will be that maintenance on any unaffected train or subsystem is properly controlled and emergent issues are properly addressed. The basis will further state that the risk assessment need not be quantified, but may be a qualitative assessment of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

Both Calvert Cliffs and Ginna have a Technical Specification Bases Control Program consistent with the Improved Standard Technical Specifications.

ENVIRONMENTAL EVALUATION

We have reviewed the environmental evaluation included in the model safety evaluation dated May 3, 2005 as part of the CLIIP. We have concluded that the staff's findings presented in that evaluation are applicable to Calvert Cliffs and Ginna and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT (2)

REGULATORY COMMITMENTS

ATTACHMENT 2

REGULATORY COMMITMENTS

The following table identifies those actions committed to by Calvert Cliffs Nuclear Power Plant and R.E. Ginna Nuclear Power Plant in this document. Any other statements in this submittal are provided for information purposes only and are not considered to be regulatory commitments.

REGULATORY COMMITMENTS	ACTION COMPLETE BY
Calvert Cliffs Nuclear Power Plant and R.E. Ginna Nuclear Power Plant will establish the Technical Specification basis for LCO 3.0.8 as applicable to the approved license amendment.	Implemented with the approved amendment.

ATTACHMENT (3)

Calvert Cliffs Nuclear Power Plant

Technical Specification Markup

Constellation Generation Group
October 17, 2007

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]~~ Insert LCO 3.0.8

LCO 3.0.9 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

INSERT

LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

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

ATTACHMENT (4)

R.E. Ginna Nuclear Power Plant

Technical Specification Markup

Constellation Generation Group
October 17, 2007

LCO 3.0.7 Test Exception LCO 3.1.8, "PHYSICS TEST Exceptions - MODE 2," allows 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. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

Insert LCO 3.0.8

INSERT

LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

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