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December 13, 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
Supplement to Application for Technical Specification Change to Add LCO 3.0.8
on the Inoperability of Snubbers Using the Consolidated Line Item Improvement
Process

REFERENCES:

- (a) Letter from J. M. Heffley (CNGG) to Document Control Desk (NRC), dated October 17, 2007, "Application for Technical Specification Change to Add LCO 3.0.8 on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process"
- (b) Letter from J. A. Spina (CCNPP) to Document Control Desk (NRC), dated May 2, 2007, "License Amendment Request: Add LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process"
- (c) Letter from D. V. Pickett (NRC) to J. A. Spina (CCNPP), dated September 27, 2007, "Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 – Amendment Re: Implementation of LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process (TAC Nos. MD5437 and MD5438)"

This letter is to correct similar omissions in the submittal of References (a) and (b).

Limiting Condition for Operation 3.0.8

Reference (a) submitted a request to change the Technical Specifications for Calvert Cliffs Nuclear Power Plant and R.E. Ginna Nuclear Power Plant to add Limiting Condition for Operation (LCO) 3.0.8. In that submittal we inadvertently omitted a markup for a related change to LCO 3.0.1. This supplement provides a Calvert Cliffs Nuclear Power Plant markup for that change. The markup for R.E. Ginna Nuclear Power Plant will be submitted separately.

We are also providing a markup for the Technical Specification Bases for LCOs and LCO 3.0.8 [Attachment (2)]. These markups are related to Reference (a) and are provided for information only.

Analysis

Limiting Condition for Operation 3.0.8 will provide an allowance of time to repair or replace an inoperable seismic snubber without declaring the supported system inoperable. Limiting Condition for Operation 3.0.1 requires LCOs to be complied with, except as provided in certain LCOs. Since LCO 3.0.8 will provide an exception to LCO 3.0.1, it should be listed among the exceptions. This supplement adds LCO 3.0.8 to the exceptions. A Technical Specification page markup is provided in Attachment (1).

Adding the reference to LCO 3.0.8 in LCO 3.0.1 does not change the Significant Hazards Discussion in Reference (a).

Limiting Condition for Operation 3.0.9

Reference (b) submitted a request to change the Technical Specifications for Calvert Cliffs Nuclear Power Plant to add Limiting Condition for Operation (LCO) 3.0.9. In that submittal we inadvertently omitted a markup for a related change to LCO 3.0.1. This letter provides a markup for that change. The license amendment request posed in Reference (b) was approved by Reference (c).

Analysis

Limiting Condition for Operation 3.0.9 provides an allowance of time to remove a barrier without declaring the supported system inoperable. Limiting Condition for Operation 3.0.1 requires LCOs to be complied with, except as provided in certain LCOs. Since LCO 3.0.9 will provide an exception to LCO 3.0.1, it should be listed among the exceptions. This supplement adds LCO 3.0.9 to the exceptions. A Technical Specification page markup is provided in Attachment (1).

Adding the reference to LCO 3.0.9 in LCO 3.0.1 does not change the Significant Hazards Discussion in Reference (b).

Should you have questions regarding this matter, please contact Mr. Jay S. Gaines at (410) 495-5219.

Very truly yours,



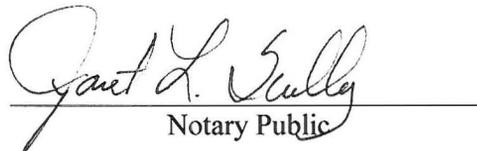
STATE OF MARYLAND :
 : TO WIT:
COUNTY OF CALVERT :

I, James A. Spina, 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 13th day of December, 2007.

WITNESS my Hand and Notarial Seal:



Notary Public

My Commission Expires:

March 1, 2011
Date

JAS/EMT/bjd

- Attachments: (1) Technical Specification Markup – LCO 3.0.1
(2) Technical Specification Bases Markup – For Information Only

cc: D. V. Pickett, NRC
S. J. Collins, NRC

Resident Inspector, NRC
R. I. McLean, DNR

ATTACHMENT (1)

TECHNICAL SPECIFICATION MARKUP –
LCO 3.0.1

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7, LCO 3.0.8 and LCO 3.0.9

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

ATTACHMENT (2)

**TECHNICAL SPECIFICATION BASES MARKUP –
FOR INFORMATION ONLY**

BASES

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Test Exception (STE) LCOs 3.1.7, 3.1.8, and 3.4.17 allow specific Technical Specification requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with these Technical Specifications. Unless otherwise specified, all the other Technical Specification requirements remain unchanged. This will ensure all appropriate requirements of the MODE, or other specified condition not directly associated with or required to be changed to perform the special test or operation, will remain in effect.

The Applicability of a STE LCO represents a condition not necessarily in compliance with the normal requirements of the Technical Specification. Compliance with STE LCOs is optional. A special operation may be performed either under the provisions of the appropriate STE LCO or under the other applicable Technical Specification requirements. If it is desired to perform the special operation under the provisions of the STE LCO, the requirements of the STE LCO shall be followed.

Insert LCO 3.0.8 →

INSERT

LCO 3.0.8 Limiting Condition for Operation (LCO) 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications in the Technical Requirements Manual (TRM). The snubber requirements do not meet the criteria in 10 CFR 50.36(d)(2)(ii), and, as such, are appropriate for control by the TRM.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

Limiting Condition for Operation 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. Limiting Condition for Operation 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

Limiting Condition for Operation 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. Limiting Condition for Operation 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

Limiting Condition for Operation 3.0.8 requires that risk be assessed and managed. Industry and Nuclear Regulatory Commission guidance on the

implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 must be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.