James A. Spina Vice President



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April 11, 2008

U. S. Nuclear Regulatory Commission Washington, DC 20555

ATTENTION: Document Control Desk

- SUBJECT: Calvert Cliffs Nuclear Power Plant Unit No. 2; Docket No. 50-318 Three-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"
- **REFERENCE:** (a) NRC Generic Letter 2008-01, dated January 11, 2008, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 (Reference a) to request that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling systems, Decay Heat Removal system, and Containment Spray system, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

Reference (a) requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the GL, to provide the following information:

- (a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that they are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that they determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee "shall provide a response within 3 months of the date of this GL." In the three month response, the

Document Control Desk April 11, 2008 Page 2

STATE OF MARYLAND

COUNTY OF CALVERT

licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

The Attachment to this letter contains Calvert Cliffs Nuclear Power Plant, Inc. three month response to the requested information in NRC GL 2008-01 for Calvert Cliffs Unit 2.

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

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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 response 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 <u>34</u>. Mary's, this <u>11</u> day of <u>April</u>, 2008.

WITNESS my Hand and Notarial Seal:

My Commission Expires:

JAS/ALS/bjd

Attachment: (1) Calvert Cliffs Nuclear Power Plant Three-Month Response

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

Resident Inspector, NRC S. Gray, DNR

ATTACHMENT (1)

CALVERT CLIFFS NUCLEAR POWER PLANT

THREE-MONTH RESPONSE

CALVERT CLIFFS NUCLEAR POWER PLANT THREE-MONTH RESPONSE

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the Calvert Cliffs Nuclear Power Plant, Inc. three-month response for Calvert Cliffs Unit 2. This response discusses:

- 1) The required evaluations that will not be complete by October 11, 2008 (nine months from the date of GL 2008-01),
- 2) The alternative course of action planned, and
- 3) The basis for acceptability of the alternative course of action.

The evaluations requested by the GL require physical walkdowns to confirm locations of high point vents, as-built configurations (such as pipe locations, elevations, and slope), and performance of non-intrusive examinations, such as ultrasonic testing, of piping with the potential to contain accumulated gasses. Portions of these piping systems are located inside the Unit 2 Containment and the Unit 2 27' West Penetration Room. During power operation these areas are locked high radiation areas. Currently, Calvert Cliffs Unit 2 does not have a scheduled outage to conduct the required walkdowns in these areas within the nine month period requested in the GL. The next scheduled outage is the spring 2009 Calvert Cliffs Unit 2 refueling outage. Therefore, the sections of piping in the areas identified above will be deferred until the next scheduled Unit 2 refueling outage. Plans are currently being formulated to complete the actions discussed above should an opportunity develop providing access prior to the next scheduled Unit 2 refueling outage.

These systems are routinely tested in accordance with Technical Specifications and the in-service testing program. Previous issues involving gas accumulation have been documented, evaluated, and corrected. The on-line tests and routine evolutions conducted during refueling outages cover the design basis alignments to the extent practicable for these systems, for both suction and discharge piping, and consistently demonstrate system operability.

Additionally, we have performed system walkdowns and ultrasonic testing of the Calvert Cliffs Unit 1 piping sections, including those piping sections located in the Unit 1 Containment and the Unit 1 27' West Penetration Room. These actions for Unit 1 were conducted during this year's refueling outage. No accumulation of gas was found in the evaluated piping that would challenge operability of the systems. Since the overall pipe arrangements and operating procedures are similar between Units 1 and 2, we have confidence that Unit 2 piping inspections will yield similar positive results.

Calvert Cliffs remains confident that the Calvert Cliffs Unit 2 shutdown cooling, safety injection and containment spray systems can fulfill their required functions based on over 30 years of operating experience, including system walkdowns, detailed evaluations, and system improvements. Calvert Cliffs Unit 2 will complete as much of the requested GL actions within the requested nine month period as is practical, based upon accessibility of the subject systems.

Based upon the above, Calvert Cliffs believes that completing performance of the detailed walkdowns and subsequent evaluations of those portions of piping at Calvert Cliffs Unit 2, outside the requested nine month period, is an acceptable alternative course of action. Within six months after the end of the next scheduled Calvert Cliffs Unit 2 refueling outage, we will submit a written response informing the NRC of the activities performed consistent with the actions and information requested by GL 2008-01.