



October 1, 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  
Revised Request to Extend the Inservice Inspection Interval for Reactor Vessel  
Weld Examinations – Relief Requests (ISI-020 and ISI-021)

- REFERENCES:**
- (a) Westinghouse Owners Group Topical Report, WCAP-16168-NP-A, Revision 2, dated June 2008, Risk-Informed Extension of Reactor Vessel In-Service Inspection Interval
  - (b) Letter from H. K. Nieh (NRC) to G. Bischoff (PWROG), dated May 8, 2008, Final Safety Evaluation for Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR) WCAP-16168-NP, Revision 2, Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval” (TAC No. MC9768)
  - (c) Letter from J. A. Spina (CCNPP) to Document Control Desk (NRC), dated October 1, 2008, License Amendment Request: Reporting of Reactor Vessel In-Service Inspection Information and Analyses in Support of Code Relief Request for Extension of Reactor Vessel In-Service Inspection Interval
  - (d) Letter from M. D. Flaherty (CCNPP) to Document Control Desk (NRC), dated May 1, 2008, Request to Extend the Third Ten-Year Inservice Inspection Interval for Reactor Vessel Weld and Visual Examinations

In Westinghouse Topical Report WCAP-16168-NP-A, Revision 2 (Reference a), the Pressurized Water Reactor Owners Group provided the technical and regulatory basis for decreasing the frequency of inspections by extending the American Society of Mechanical Engineers (ASME) Code Section XI inservice inspection interval from the current 10 years to 20 years for ASME Code Section XI examination categories B-A and B-D reactor pressure vessel (RPV) welds. The Nuclear Regulatory Commission approved the topical report by letter dated May 8, 2008 (Reference b). To implement the change presented in Reference (a), Calvert Cliffs Nuclear Power Plant (CCNPP) hereby submits Attachment (1) (ISI-20) in accordance with the Safety Evaluation (Reference b), to request an alternative from the Code requirements pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the alternative inspection interval (20 years) provides an acceptable level of quality and safety. The plant specific information identified by Reference (a) as needed to support this proposed alternative is provided in Attachment (1).

Future inspections of examination categories B-A and B-D RPV welds will be performed in 2019 and 2039 for Unit 2. Additionally, as required by Reference (b), a license amendment request has been submitted in support of this request (Reference c).

Further, pursuant to 10 CFR 50.55a(a)(3)(ii), CCNPP is requesting approval to delay compliance with the specified requirements of ASME Section XI, Table IWB-2500-1, for CCNPP Unit 2. Relief is requested to defer visual examinations under ASME Section XI Table IWB-2500-1 examination categories B-N-2 and B-N-3, Item Nos. B13.50, B13.60, and B13.70 for the extended inspection interval from 10 to 20 years as described in Attachment (2) (ISI-21). Deferring the subject visual examinations associated with the reactor vessel core support structure removal to the extended inspection interval allows those examinations to be performed at the same time (2019 and 2039 refueling outages) as the examination categories B-A and B-D RPV welds described in Attachment (1).

Calvert Cliffs' proposed extension of the ISI interval for these examinations will continue to provide an acceptable level of quality and safety, as described in the enclosed relief requests.

In Reference (d), we requested approval to defer the subject examinations for one fuel cycle. We are withdrawing Reference (d) in its entirety with this letter.

Calvert Cliffs requests the Nuclear Regulatory Commission staff approval by January 15, 2009, in order to support preparation activities for the spring 2009 Unit 2 refueling outage.

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

Very truly yours,



Mark D. Flaherty  
Manager-Engineering Services

MDF/ALS/bjd

Attachments: (1) Proposed Alternative ISI-020  
(2) Proposed Alternative ISI-021

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

S. Gray, DNR  
Safety Program Manager, State of Maryland