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CENG
a joint venture of
Constellation Energy · EDF

CALVERT CLIFFS
NUCLEAR POWER PLANT

April 5, 2010

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; Section 5.0, Administrative Controls, Personnel Title Revisions and Administrative Changes

REFERENCES:
(a) Industry/TSTF Standard Technical Specification Change Traveler, TSTF-65, Revision 1, Use of Generic Titles for Utility Positions
(b) NUREG-1432, Volume 1, Revision 3.0, June 2004, Standard Technical Specifications Combustion Engineering Plants

Pursuant to 10 CFR 50.90, Calvert Cliffs Nuclear Power Plant, LLC hereby requests an Amendment to the Renewed Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 and 2, respectively to:

(1) Replace plant specific titles in Calvert Cliffs Technical Specification 5.0, Administrative Controls, with generic titles consistent with Reference (a) which was approved by the Nuclear Regulatory Commission on December 2, 1997.

(2) Implement changes to more closely align selected Technical Specifications with the Improved Standard Technical Specifications (Reference b).

(3) Implement administrative word changes to selected Technical Specifications.

There are no regulatory commitments associated with this proposed amendment.

Calvert Cliffs Nuclear Power Plant requests approval of this proposed amendment by April 1, 2011 and an implementation period of 60 days.

A001
NRR

Attachment (1) contains the significant hazards discussion and the evaluation of the proposed changes. Attachment (2) contains the marked-up pages of the proposed changes.

Should you have questions regarding this matter, please contact Mr. Douglas E. Lauver at (410) 495-5219.

Very truly yours,

George Gellrich

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

I, George H. Gellrich, being duly sworn, state that I am Vice President - Calvert Cliffs Nuclear Power Plant, LLC (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.

George Gellrich

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of St. Mary's, this 5th day of April, 2010.

WITNESS my Hand and Notarial Seal:

Janet L. Scully
Notary Public

My Commission Expires:

March 1, 2011
Date

GHG/KLG/bjd

Attachments: (1) Evaluation of the Proposed Change
(2) Marked up Technical Specification Pages

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

bcc: C. W. Fleming, Esquire
G. H. Gellrich
T. E. Trepanier
E. D. Dean
M. S. Draxton
D. L. Frye
S. A. Henry
K. F. Robinson
J. J. Stanley
D. J. Bartnik
D. E. Lauver / P. S. Furio
B. J. Dough (AIT No.)
D. Fitz
K. L. Greene
R. C. Jones
J. E. Branyan
J. F. Etzweiler

File # 09.04
Electronic Docket

NRC 08-035

COMMITMENTS IDENTIFIED IN THIS CORRESPONDENCE:

- Revise the UFSAR to document the alignment of plant specific personnel titles to the proposed generic titles used in the Technical Specifications.

Responsible Person/Organization:	PS Furio / KL Greene / NL
Due Date:	06/15/2011
SAR/TSB Revision Required?	Yes
CT No.:	
Posting Requirements for Responses -- NOV/Order	**No**

ATTACHMENT (1)

EVALUATION OF THE PROPOSED CHANGE

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1.0 SUMMARY DESCRIPTION

This letter requests an amendment to Renewed Operating Licenses DPR-53 and DPR-69 for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs), Unit Nos. 1 and 2. The proposed changes will make title changes and corrections within Technical Specification Section 5.0, Administrative Controls. The proposed changes include:

(1) Replacement of the use of plant specific titles to generic titles consistent with Reference 1, which was approved by the Nuclear Regulatory Commission on December 2, 1997.

(2) Changes made to more closely align selected Technical Specifications with the Improved Standard Technical Specifications (ISTS) (Reference 2).

(3) Administrative changes to specified Technical Specifications.

2.0 DETAILED DESCRIPTION

The first portion of the license amendment request proposes a change from the use of a plant specific title to a generic title. The proposed change is:

(1) Revise Technical Specification 5.2.1.c to replace the title "Vice President-Nuclear Energy" with the generic title "A specified corporate officer."

The second portion of the license amendment request implements word changes that align Technical Specifications 5.2.2.f and 5.5.4.k to be consistent with the words contained in the ISTS. These changes are:

(1) Revise Technical Specification 5.2.2.f to state "The operations manager or assistant operations manager shall hold an SRO license." This change will also remove the requirement that the Senior Reactor Operator (SRO) license must be from Calvert Cliffs and will delete the sentence "The General Supervisor –Nuclear Plant Operations shall hold an SRO license."

(2) Revise Technical Specification 5.5.4.k to add the words ", Iodine-133, Tritium," following the words "Iodine-131".

The third portion of the license amendment request involves changes that are administrative in nature. These changes are:

(1) Revise Technical Specification 5.5.4.d to replace the words "each unit" with "the site."

(2) Revise Technical Specification 5.5.4.k to replace the words "each unit" with "the site."

(3) Revise Technical Specification 5.2.1.a by changing the title "Quality Assurance Policy" to its correct corporate title of "Quality Assurance Topical Report."

3.0 TECHNICAL EVALUATION

The Technical Specification Section 5.0 changes, as proposed by this license amendment request, involve either position title changes or administrative changes that do not affect the technical requirements of the Calvert Cliffs' Technical Specifications. These proposed changes do not impact plant safety systems or impact any design basis accident. In addition, these changes do not involve any changes to plant equipment or any changes to the methods of plant operation or plant maintenance.

Replacement of Plant Specific Titles with Generic Titles

This proposed change will revise Technical Specification 5.2.1.c to replace the title "Vice President-Nuclear Energy" with the generic title "A specified corporate officer." Reference 1 allows the use of

generic titles in lieu of plant specific titles. This TSTF is applicable to Calvert Cliffs and was approved by the Nuclear Regulatory Commission. The proposed title change in Technical Specification 5.2.1.c is consistent with Reference 1. In addition, the proposed title change does not have any safety implications as the responsibilities and requirements of the position are unchanged. As a result, this proposed title change is considered to be administrative in nature. In concert with this proposed personnel title change, the appropriate sections of the Calvert Cliffs Updated Final Safety Analysis Report will be revised to document the alignment of the site specific personnel titles to the generic personnel titles.

Alignment with ISTS

This proposed change will revise Technical Specification 5.2.2.f to state "The operations manager or assistant operations manager shall hold an SRO license." This change will also remove the requirement that the Senior Reactor Operator (SRO) license must be from Calvert Cliffs and will delete the sentence "The General Supervisor –Nuclear Plant Operations shall hold an SRO license." This will align the words in this Technical Specification to the words contained in the ISTS (Reference 2). At the time of the initial transition to ISTS, Calvert Cliffs did not update this Technical Specification to the words contained in ISTS. Technical Specification 5.3.1 requires that "Each member of the unit staff shall meet or exceed the minimum qualifications of American National Standards Institute N18.1-1971". The words in the ISTS for this Technical Specification (and thus this proposed change) meet the requirements contained in American National Standards Institute N18.1-1971. Inclusion of the generic title of assistant operations manager is considered a direct replacement of the existing title of General Supervisor-Nuclear Plant Operations. The Updated Final Safety Analysis Report will be modified to provide the link between the generic title (assistant operations manager) to the current site specific title of General Supervisor-Shift Operations. The proposed changes to Technical Specification 5.2.2.f will now make this Technical Specification identical to the words contained in the ISTS. This requirement that either the operations manager or the assistant operations manager have an SRO license provides acceptable assurance of operational knowledge and experience within operations management to provide day-to-day interface with the operational aspects of control room activities and to communicate operational issues to higher level management.

The proposed change to Technical Specification 5.5.4.k will revise Technical Specification 5.5.4.k to add the words ", Iodine-133, Tritium," following the words "Iodine-131". This aligns the listed gaseous effluents in Technical Specification 5.5.4.k with the gaseous effluents identified in the ISTS. During the initial conversion to ISTS, a decision was made that it was not necessary to list Iodine-133 and Tritium, so this portion of the ISTS was not adopted. Later it was identified that the determination was incorrect so this proposed change corrects this and serves to bring this portion of Technical Specification 5.5.4.k into alignment with ISTS. Although the decision was to not specifically identify Iodine-133 and Tritium in Technical Specification 5.5.4.k, nevertheless these gaseous effluents have always been monitored. This change, therefore, is administrative in nature in that it does not either alter any existing practices or implement any new practices or requirements at Calvert Cliffs.

Administrative Changes

Implementation of Amendment Nos. 227 and 201, which were approved by Reference 3, converted Calvert Cliffs Technical Specifications to the ISTS. As part of this conversion, Calvert Cliffs unintentionally adopted, for Technical Specifications 5.5.4.d and k, the ISTS words that limitations of released gaseous and liquid effluents at the site boundary are monitored from each unit. In reality, since both units are located adjacent to each other, monitoring of areas at the site boundary measures total site releases and not individual unit releases. Therefore, changes are proposed to Technical Specifications 5.5.4.d and 5.5.4.k to replace the words "each unit' with the words "the site." This proposed change does not change the allowed effluent limits for the site as Calvert Cliffs has always

monitored total site effluent levels at the site boundary. Since there is no change to allowed effluent levels or any change in any site process or procedure, this proposed change is considered administrative. While this change slightly deviates from the wording in the ISTS, it is consistent with the intent of the ISTS in that gaseous and liquid effluent releases are monitored to ensure limited levels on areas at the site boundary. This proposed change does not change any plant operation requirements and, as such, does not result in any adverse safety implications.

A change is proposed to revise Technical Specification 5.2.1.a by changing the title "Quality Assurance Policy" to its correct corporate title of "Quality Assurance Topical Report." The change to Technical Specification 5.2.1.a is also administrative in nature as it simply updates this Technical Specification to the correct corporate title of "Quality Assurance Topical Report." This proposed change does not result in any change to any site process or procedure.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed change to Technical Specification 5.2.1.c involves the replacement of a site specific title with a generic title. Paragraph 50.34(b)(6)(i) of Title 10 of the Code of Federal Regulations (CFR) requires that the final safety analysis report for a license to operate a nuclear power plant include information concerning the organizational structure, personnel qualifications, and related matters. Title 10 CFR 50.36(c)(5) requires administrative controls related to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. In meeting 10 CFR 50.36(c)(5), the Technical Specifications list requirements on the organization for the safe operation of the facility, including listing titles of positions within the organization structure.

The proposed changes to Technical Specifications 5.2.2.f and 5.5.4.k involve alignment of Calvert Cliffs Technical Specifications to be consistent with words listed in NUREG-1432, Vol. 1, Revision 3.0, "Standard Technical Specifications Combustion Engineering Plants." The Improved Standard Technical Specifications as listed in NUREG-1432 were developed based on the criteria in the Final Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 22, 1993 which was in turn codified into 10 CFR Part 50, Section 36.

The proposed changes to Technical Specifications 5.2.1.a, 5.5.4.d, and 5.5.4.k are administrative in nature and, as such, do not have associated regulatory requirements or guidance.

4.2 Precedent

Below is a list of other facilities that have been granted approval of similar amendments for Technical Specification 5.2.1.c:

Facility	Amendment #	Approval Date
Cooper Nuclear Station	200	07/15/2003
Wolf Creek Generating Station	149	11/06/2002

These two approved license amendment requests establish precedence for the proposed changes to Technical Specification 5.2.1.c in that it involves the replacement of a plant specific title with a generic title that is consistent with Reference 1.

There are no specific precedents for the other proposed changes.

4.3 Significant Hazards Consideration

Calvert Cliffs is proposing changes that involve: 1) the replacement of a plant specific title with a generic title consistent with Industry/TSTF Standard Technical Specifications Change Traveler TSTF-65, 2) changes made to more closely align selected Technical Specifications with the Improved Standard Technical Specifications, and 3) administrative changes to selected Technical Specifications.

Title 10 CFR 50.91(a)(1) requires that licensee requests for operating license amendments be accompanied by an evaluation of any significant hazard posed by issuance of the requested amendment. Calvert Cliffs has evaluated the proposed amendment with respect to the criteria in 10 CFR 50.92(c) and concluded that:

1. *Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?*

   No.

   The first portion of the proposed change, involving adoption of a generic title vice a plant specific personnel title, is administrative in nature. As such, this change does not involve any change to the design basis of the plant or of any structure, system, or component. As a result there is no change to the probability or consequences of any previously evaluated accident.

   The second portion of the proposed change involves changes to Technical Specifications that align them to the words used in the Improved Standard Technical Specifications for gaseous effluents to include effluents that are already routinely monitored. In addition, the proposed change in requiring either the operations manager or assistant operations manager to hold a Senior Reactor Operator (SRO) license meets the established standards of American National Standards Institute N18.1-1971 for individuals filling the applicable positions. These changes do not involve any change to the design basis of the plant or of any structure, system, or component. As a result there is no change to the probability or consequences of any previously evaluated accident.

   The third portion of the proposed change involves administrative changes that do not involve any change to the design basis of the plant or of any structure, system, or component. As a result there is no change to the probability or consequences of any previously evaluated accident.

   Therefore, operation of the facility in accordance with the proposed changes will not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. *Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?*

   No.

   The first portion of the proposed change, involving adoption of a generic title vice a plant specific personnel title is administrative in nature. As such, this change does not result in any physical alterations to the plant configuration, make any change to plant operation, or alter any design function. As a result no new accident failure mechanisms or single failures are introduced.

   The second portion of the proposed change involves changes to Technical Specifications that align those Technical Specifications to the words used in the Improved Standard Technical Specifications for gaseous effluent monitoring to include certain effluents that are already routinely monitored. In

addition, the proposed change requiring either the operations manager or assistant operations manager to hold an SRO license meets the established standards of American National Standards Institute N18.1-1971 for individuals filling the applicable positions. These changes do not involve any change to the design basis of the plant or of any structure, system, or component. As a result no new accident failure mechanisms or single failures are introduced.

The third portion of the proposed change involves administrative changes that do not involve any change to the design basis of the plant or of any structure, system, or component. As a result no new accident failure mechanisms or single failures are introduced.

Therefore, operation of the facility in accordance with the proposed changes will not involve a significant increase in the probability or consequence of an accident previously evaluated.

3. *Does the proposed amendment involve a significant reduction in a margin of safety?*

No.

The first portion of the proposed change, involving adoption of a generic title vice a plant specific personnel title is administrative in nature. As such, this change involves no change to the design bases functions or to the controlling values of parameters used to avoid exceeding regulatory or licensing limits. As a result there is no decrease in any margin of safety due to this proposed change.

The second portion of the proposed change involves changes to Technical Specifications that align those Technical Specifications to the words used in the Improved Standard Technical Specifications for gaseous effluent monitoring to include certain effluents that are already routinely monitored. In addition, the proposed change requiring either the operations manager or assistant operations manager to hold an SRO license meets the established standards of American National Standards Institute N18.1-1971 for individuals filling the applicable positions. As such, these changes involve no change to the design bases functions or to the controlling values of parameters used to avoid exceeding regulatory or licensing limits. As a result there is no decrease in any margin of safety due to these proposed changes.

The third portion of the proposed change involves administrative changes that do not involve any change to the design basis of the plant or of any structure, system, or component. As such, these changes involve no change to the design bases functions or to the controlling values of parameters used to avoid exceeding regulatory or licensing limits. As a result there is no decrease in any margin of safety due to these proposed changes.

Therefore, operation of the facility in accordance with the proposed changes will not involve a significant reduction in a margin of safety.

Based upon the above evaluation, Calvert Cliffs has concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the

amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion as set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed amendment.

6.0 REFERENCES

1. Industry/TSTF Standard Technical Specification Change Traveler, TSTF-65, Revision 1, Use of Generic Titles for Utility Positions
2. NUREG-1432, Volume 1, Revision 3.0, June 2004, Standard Technical Specifications Combustion Engineering Plants
3. Letter from A. W. Dromerick (NRC) to C. H. Cruse (BGE), dated May, 04, 1998, Issuance of Amendments for Calvert Cliffs Nuclear Power Plant Unit No. 1 and Unit No. 2

ATTACHMENT (2)

MARKED UP TECHNICAL SPECIFICATION PAGES

Calvert Cliffs Nuclear Power Plant, LLC
April 5, 2010

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Updated Final Safety Analysis Report (UFSAR) or Quality Assurance ~~Policy~~; TOPICAL REPORT

b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;

c. ~~The Vice President-Nuclear Energy~~ A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and

d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2 Organization

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A total of three non-licensed operators shall be assigned to the Units 1 and 2 shift crews.

b. Those licensed operators counted toward minimum shift crew composition required by 10 CFR 50.54(m)(2)(i) shall be licensed for both units.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i), 5.2.2.a, and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A radiation protection technician shall be onsite when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Deleted.

f. The operations manager or assistant operations manager shall hold ~~or have held~~ an SRO license ~~at Calvert Cliffs~~. ~~The General Supervisor-Nuclear Plant Operations shall hold an SRO license.~~

g. One Shift Technical Advisor (STA) shall be assigned to the shift crew when either unit is in MODE 1, 2, 3, or 4, and shall be filled as follows:

   1. By the Shift Supervisor (SS) or an on-shift SRO license holder, provided the individual meets the Commission Policy Statement on Engineering Expertise on Shift; or

5.5 Programs and Manuals

be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation, including surveillance tests and setpoint determination, in accordance with the methodology in the ODCM;

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 CFR Part 20, Appendix B, Table II, Column 2;

c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from ~~each unit~~ the site to unrestricted areas to be limited:

   1. During any calendar quarter: Less than or equal to 3 mrems to the total body, and to less than or equal to 10 mrems to any organ; and

   2. During any calendar year: Less than or equal to 6 mrems to the total body, and to less than or equal to 20 mrems to any organ;

e. Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year, in accordance with the methodology and parameters in the ODCM, at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days;

f. Limitations on the functional capability and use of the Liquid Radwaste Treatment System to ensure that appropriate portions of this system are used to reduce releases of

5.5 Programs and Manuals

2. During any calendar year: Less than or equal to 20 mrads for gamma radiation, and less than or equal to 40 mrads for beta radiation;

k. Limitations on the annual and quarterly doses to a member of the public from Iodine-131 and all radionuclides in particulate form with half-lives greater than 8 days, in gaseous effluents released from ~~each unit~~ to areas beyond the site boundary, to be limited:

1. During any calendar quarter: Less than or equal to 15 mrems to any organ:

2. During any calendar year: Less than or equal to 30 mrems to any organ; and

3. Less than 0.1% of the limits of 5.5.4.k(1) and (2) as a result of burning-contaminated oil; and

l. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity, and to radiation from uranium fuel cycle sources to be limited to less than or equal to 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the UFSAR, Section 4.1 cyclic and transient occurrences to ensure that components are maintained within the design limits.