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CALVERT CLIFFS
NUCLEAR POWER PLANT

October 25, 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: Revision of Limiting Condition for
Operation 3.0.5

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 & 2, respectively that revises Technical Specification Limiting Condition for Operation 3.0.5. The proposed change provides clarification as to when Limiting Condition for Operation 3.0.5 can be invoked in order to perform required testing to demonstrate OPERABILITY of equipment.

The significant hazards discussion and the technical basis for this proposed change are provided in Attachment (1). The marked up Technical Specification page is provided in Attachment (2). There are no regulatory commitments associated with this proposed amendment.

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

ADD
NRR

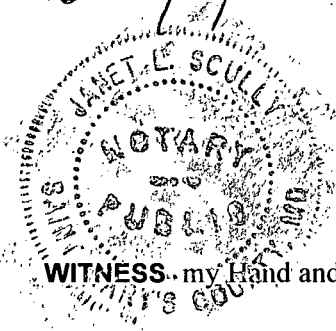
Should you have any questions regarding this matter, please contact Mr. Douglas E. Lauver at (410) 495-5219.

Very truly yours,

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.

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of St. Mary's, this 25th day of October, 2010.



WITNESS my Hand and Notarial Seal:

Notary Public

My Commission Expires:

Date

GHG/KLG/bjd

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

cc: D. V. Pickett, NRC
W. M. Dean, NRC

Resident Inspector, NRC
S. Gray, DNR

ATTACHMENT (1)

EVALUATION OF THE PROPOSED CHANGE

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ATTACHMENT (1)
EVALUATION OF PROPOSED CHANGE

1.0 SUMMARY DESCRIPTION

This evaluation supports a request to amend Renewed Operating Licenses DPR-53 and DPR-69 for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs) Unit Nos. 1 and 2 by revising Technical Specification Limiting Condition for Operation (LCO) 3.0.5. The proposed change revises the words in LCO 3.0.5 to include additional situations where equipment is either placed into service or repositioned in order to comply with Technical Specification ACTIONS.

2.0 DETAILED DESCRIPTION

Limiting Condition for Operation 3.0.5 currently states:

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

The proposed change revises LCO 3.05 to read:

Equipment removed from service, declared inoperable, placed into service, or repositioned to comply with ACTIONS may be temporarily returned to service, removed from service, or returned to its previous position under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system placed under administrative control to perform the testing required to demonstrate OPERABILITY.

The purpose of this proposed change is to more clearly specify the situations when LCO 3.0.5 may be applied. As currently written, LCO 3.0.5 can only be used when equipment is either removed from service or declared inoperable in order to comply with ACTIONS. However, in several Technical Specifications at Calvert Cliffs, the Required Action does not involve equipment that is either removed from service or declared inoperable but instead involves the repositioning of a component or involves the positioning of or placing into service of other component(s). This proposed change seeks to better delineate the situations when LCO 3.0.5 may be applied. While this proposed change expands the situations under which LCO 3.0.5 can be used, it does not change the intent of the LCO. The purpose of LCO 3.0.5 remains to provide an exception to LCO 3.0.2 to not comply with the applicable Required Action(s) in order to perform required testing to demonstrate the OPERABILITY of either the equipment being returned to service or the OPERABILITY of other equipment.

3.0 TECHNICAL EVALUATION

The proposed change to LCO 3.0.5 seeks to more clearly specify those situations when LCO 3.0.5 may be applied. Currently LCO 3.0.5 allows equipment that is removed from service or declared inoperable in order to comply with ACTIONS to be returned to service, under administrative control, to perform testing required to demonstrate its operability or the operability of other equipment. In some Technical Specifications, the steps taken to comply with ACTIONS involve the placement of redundant or alternate equipment or trains into service, or the repositioning (e.g., opening or closing) of components. The proposed change would allow the use of LCO 3.0.5 in situations such as these. This proposed change does not, however, change the intent of LCO 3.0.5. The purpose of LCO 3.0.5 remains to provide an exception to LCO 3.0.2 to not comply with the applicable Required Action(s) while performing required testing to demonstrate the OPERABILITY of either the equipment being returned to service or the OPERABILITY of other equipment.

ATTACHMENT (1)
EVALUATION OF PROPOSED CHANGE

An example of the need for this proposed change can be found in Technical Specification 3.7.3, Auxiliary Feedwater (AFW). When a steam-driven AFW pump is determined to be inoperable, Required Action 3.7.3.A.1 requires aligning the remaining operable steam-driven AFW pump to automatic initiating status. Following repairs to the inoperable AFW pump, we need to return the operable AFW pump back to its standby status while we conduct the operability test on the repaired AFW pump. This type of action does not fit into the words currently contained in LCO 3.0.5, 'Equipment removed from service or declared inoperable to comply with ACTIONS ...'. With the proposed change actions such as this would be allowed under LCO 3.0.5.

Another example of the need for this proposed change can be found in Technical Specification 3.3.7, Containment Radiation Signal. For a case when a manual actuation channel or actuation logic channel is determined to be inoperable, Required Action 3.3.7.B.1 requires placing and maintaining the containment purge and exhaust valves in the closed position. Once the inoperable channel is repaired, it may be necessary to return the containment purge and exhaust valves to their previous position in order to verify the operability of the containment radiation signal channel. As LCO 3.0.5 is currently written, this action of positioning the containment purge and exhaust valves to their closed position does not fall within it because the steps performed to comply with the ACTION (close the containment purge and exhaust valves) does not involve "equipment removed from service or declared inoperable to comply with ACTIONS ...". The proposed change to LCO 3.0.5 would expand its use to include steps, such as this, that reposition components in order to comply with ACTIONS.

While this proposed change will encompass more types of steps taken to comply with ACTIONS, the proposed change does not alter the intent of LCO 3.0.5. The purpose of LCO 3.0.5 remains to provide an exception to LCO 3.0.2, [to not comply with the applicable Required Action(s)], while performing required testing to demonstrate the OPERABILITY of either the equipment being returned to service or the OPERABILITY of other equipment. The required testing in all cases will continue to be conducted under administrative controls to ensure the time when the equipment is in a position that conflicts with the ACTIONS is limited to the time absolutely necessary to perform the required testing.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

Title 10 CFR 50.36 requires that each operating license contains Technical Specifications that set forth the limits, operating conditions, and other requirements imposed upon facility operation in order to help ensure the protection of the health and safety of the public. Title 10 CFR 50.36(d)(2)(i) establishes LCOs that defines the lowest allowable functional capability of performance level for equipment in order to ensure safe operation of the facility.

The proposed change to clarify the situations where LCO 3.0.5 may be applied does not change the intent of LCO 3.0.5, does not change the administrative controls, and thus it continues to meet the regulatory requirements of 10 CFR 50.36.

4.2 Significant Hazards Consideration

Calvert Cliffs Nuclear Power Plant (Calvert Cliffs) is proposing a change to Technical Specification Limiting Condition for Operation (LCO) 3.0.5 that more clearly specifies the situations when LCO 3.0.5 may be applied. This proposed change has been evaluated against the three standards contained in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration in the operation of our facility for the reasons provided below.

ATTACHMENT (1)
EVALUATION OF PROPOSED CHANGE

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

No.

The proposed change to LCO 3.0.5 more clearly specifies the situations when LCO 3.0.5 can be applied. In some Technical Specifications, the steps taken to comply with ACTIONS involve the placement of redundant or alternate equipment or trains into service, or the repositioning (e.g., opening or closing) of components. The proposed change would allow the use of LCO 3.0.5 in situations such as these. This proposed change does not, however, change the intent of LCO 3.0.5. The purpose of LCO 3.0.5 remains to provide an exception to LCO 3.0.2, to not comply with the applicable Required Action(s) while performing required testing to demonstrate the OPERABILITY of either equipment being returned to service or the OPERABILITY of other equipment.

The proposed change does not affect any analyzed accident initiators, nor does it change the units' ability to successfully respond to any previously evaluated accident. As a result, there is also no change to existing radiological assumptions used in the accident evaluations. In addition this proposed change does not change the operation or maintenance performed on operating equipment.

Therefore, the proposed change does not involve a significant increase in the probability or consequences 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 proposed change to LCO 3.0.5 more clearly specifies the situations when LCO 3.0.5 can be applied. In some Technical Specifications, the steps taken to comply with ACTIONS involve the placement of redundant or alternate equipment or trains into service, or the repositioning (e.g., opening or closing) of components. The proposed change would allow the use of LCO 3.0.5 in situations such as these. This proposed change does not, however, change the intent of LCO 3.0.5. The purpose of LCO 3.0.5 remains to provide an exception to LCO 3.0.2, to not comply with the applicable Required Action(s) while performing required testing to demonstrate the OPERABILITY of either equipment being returned to service or the OPERABILITY of other equipment.

The proposed change does not involve a modification to the physical configuration of the units nor does it involve any change in the methods governing normal plant operation. The proposed change does not impose any new or different requirements or introduce a new accident initiator, accident precursor, or malfunction mechanism. Additionally there is no change in the types or increase in the amounts of any effluent that may be released offsite and there is no increase in individual or cumulative occupational exposure.

Therefore the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

No.

ATTACHMENT (1)
EVALUATION OF PROPOSED CHANGE

The proposed change to LCO 3.0.5 more clearly specifies the situations when LCO 3.0.5 can be applied. In some Technical Specifications, the steps taken to comply with ACTIONS involve the placement of redundant or alternate equipment or trains into service, or the repositioning (e.g., opening or closing) of components. The proposed change would allow the use of LCO 3.0.5 in situations such as these. This proposed change does not, however, change the intent of LCO 3.0.5. The purpose of LCO 3.0.5 remains to provide an exception to LCO 3.0.2, to not comply with the applicable Required Action(s) while performing required testing to demonstrate the OPERABILITY of either equipment being returned to service or the OPERABILITY of other equipment.

The proposed change does not involve any modification to the physical configuration of the operating units and does not alter equipment operation. As such, the safety functions of plant equipment and their response to any analyzed accident scenario are unaffected by this proposed change and thus there is no reduction in the margin of safety.

Therefore, the proposed change does not involve a significant reduction in the margin of safety for the operation of each unit.

Based on the above, Calvert Cliffs concludes 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.

4.3 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

Calvert Cliffs' review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20. However the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

ATTACHMENT (2)

MARKED UP TECHNICAL SPECIFICATION PAGE

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time, or
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or
- c. When a note is inserted in the individual value, parameter, or other Specification, that allows application of this part.

This Specification shall not prevent changes in MODEs or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

placed into service, or repositioned

LCO 3.0.5

Equipment removed from service, ~~or~~ declared inoperable, ~~to~~ comply with ACTIONS may be ~~returned to service~~, *temporarily* under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system ~~returned to service~~ under administrative control to perform the testing required to demonstrate OPERABILITY.

Removed from service, or returned to its previous position
placed →

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are