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a joint venture of



CALVERT CLIFFS
NUCLEAR POWER PLANT

May 11, 2011

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: Technical Specification 3.3.1 Revision

Pursuant to 10 CFR 50.90, Calvert Cliffs Nuclear Power Plant, LLC (Calvert Cliffs) requests an administrative amendment to the Renewed Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 and 2, respectively that revises Technical Specification 3.3.1, Reactor Protective System (RPS) Instrumentation-Operating. The proposed amendment corrects the unit of measure listed in a table within Technical Specification 3.3.1.

The significant hazards discussion and the technical basis for this proposed amendment are provided in Attachment (1). The marked up page of the affected Technical Specification is provided in Attachment (2).

Calvert Cliffs requests approval of this proposed amendment by April 15, 2012 along with an implementation period of 45 days.

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May 11, 2011

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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 THE PROPOSED CHANGE

1.0 SUMMARY DESCRIPTION

This evaluation supports a request to modify a note within Technical Specification 3.3.1, Reactor Protective System (RPS) Instrumentation—Operating, that incorrectly lists the unit of measure as psig (pounds per square inch gauge) vice psia (pounds per square inch absolute). The proposed change will revise note (c) located within Table 3.3.1-1, to indicate the value at which the RPS trip function, Steam Generator Pressure-Low, is bypassed at 785 psia vice 785 psig.

2.0 DETAILED DESCRIPTION

Note (c) within Table 3.3.1-1 of Technical Specification 3.3.1 currently states:

- (c) Bistable trip unit may be bypassed when steam generator pressure is < 785 psig. Bypass shall be automatically removed when steam generator pressure is \geq 785 psig.

The proposed change would revise note (c) within Table 3.3.1-1 of Technical Specification 3.3.1 to read:

- (c) Bistable trip unit may be bypassed when steam generator pressure is < 785 psia. Bypass shall be automatically removed when steam generator pressure is \geq 785 psia.

The proposed change to change the unit of measure to psia will align the note with other Technical Specifications and other site governing documents and operating practices associated with this RPS function. Since this proposed change does not have any effect on any other existing site governing document, procedure, or site instruction, this change therefore is considered to be administrative in nature.

3.0 TECHNICAL EVALUATION

The Calvert Cliffs RPS contains the necessary instrumentation and equipment to monitor selected Nuclear Steam Supply System parameters and initiate protective action if any of these parameters exceed an operational limit by either annunciating alarms, prohibiting control element assembly motion or tripping the reactor. The RPS is designed to ensure safe operation of the reactor through the establishment of limiting safety system settings that ensure safety limits are not exceeded during normal operations or anticipated operational occurrences. One of the RPS functions is the Steam Generator Pressure-Low Trip. The Steam Generator Pressure-Low trip provides protection against an excessive rate of heat extraction from the steam generators, which would result in a rapid uncontrolled cooldown of the Reactor Coolant System as the result of a main steam line break accident. The Steam Generator Pressure-Low instrumentation also has an operating bypass circuitry that allows this trip function to be manually bypassed when steam generator pressure is reduced during startup and shutdown operating conditions. The bypass is automatically removed when steam generator pressure is raised above the pretrip setpoint. The steam generator pressure instrumentation for this RPS trip function has its trip and pretrip setpoint and bypass value established, and tested using psia as the unit of measure. This proposed change revises Technical Specification 3.3.1 to reflect this practice.

Table 7-1 of Calvert Cliffs Updated Final Safety Analysis Report includes a note that states for Steam Generator Pressure-Low RPS function “manual inhibit permitted below 785 psia: automatically removed above 785 psia.” This proposed change brings the note in Technical Specification 3.3.1 in alignment with the Updated Final Safety Analysis Report.

A review of previous revisions of Calvert Cliffs Technical Specifications showed that prior to Calvert Cliffs adoption of the industry’s Standard Technical Specifications, our equivalent note to the current note (c) of Technical Specification 3.3.1 used psia as the unit of measure. Calvert Cliffs adopted the Standard Technical Specification version of note (c) for this Technical Specification which used psig as

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the unit of measure. It is important to note that Calvert Cliffs Technical Specification Table 3.3.4-1 [within Technical Specification 3.3.4, Engineered Safety Features Actuation System (ESFAS) Instrumentation] contains the exact same note as in Table 3.3.1-1, however the note in Table 3.3.4-1 lists psia as the unit of measure. These items further support that the change to psig within note (c) of Table 3.3.1-1 was an administrative error that occurred during Calvert Cliffs conversion to the Standard Technical Specifications. Although the note (c) of Table 3.3.1-1 was changed to psig, the units continued to operate and test the trip and pre-trip setpoints and bypass valve using psia.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed change to Technical Specification 3.3.1 is administrative in nature and as such does not alter Calvert Cliffs Reactor Protective System's ability to meet all applicable regulatory requirements.

4.2 Significant Hazards Consideration

Calvert Cliffs Nuclear Power Plant (Calvert Cliffs) is proposing a revision to Technical Specification 3.3.1. The proposed administrative change would correct the unit of measure listed in note (c) of Table 3.3.1-1 to read psia vice psig. This would align Technical Specification 3.3.1 with other Technical Specifications and other site governing documents and operating practices associated with Calvert Cliffs Reactor Protective System Steam Generator Pressure-Low trip function.

Calvert Cliffs has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92 "issuance of amendment" as discussed below:

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

Response: No.

The proposed administrative change to correct the unit of measure listed in note (c) of Technical Specification 3.3.1 to read psia vice psig does not affect any analyzed accident initiators, nor does it affect the unit's ability to successfully respond to any previously evaluated accident. In addition the proposed does not change the operation or maintenance that is performed on plant 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?*

Response: No.

The proposed administrative change corrects the unit of measure listed in note (c) of Technical Specification 3.3.1 to read psia vice psig. The proposed change does not involve a physical alteration to the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation.

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

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

Response: No.

The proposed administrative change corrects the unit of measure listed in note (c) of Technical Specification 3.3.1 to read psia vice psig. Since this is an administrative change 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 any 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 change does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding or “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 only makes a minor administrative correction to Calvert Cliffs Technical Specifications. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10)(v). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

None

ATTACHMENT (2)

MARKED UP TECHNICAL SPECIFICATION PAGE

Table 3.3.1-1 (page 3 of 3)
Reactor Protective System Instrumentation

FUNCTION	MODES	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
9b. Asymmetric Steam Generator Transient (ASGT) ^(b)	1, 2	SR 3.3.1.1 SR 3.3.1.4 SR 3.3.1.7 SR 3.3.1.8 SR 3.3.1.9	≤ 135 psid
10. Loss of Load ^(d)	1 ^(e)	SR 3.3.1.6 SR 3.3.1.7	NA

- (a) Bistable trip unit may be bypassed when NUCLEAR INSTRUMENT POWER is < 1E-4% RTP or > 12% RTP. Bypass shall be automatically removed when NUCLEAR INSTRUMENT POWER is ≥ 1E-4% RTP and < 12% RTP.
- (b) Bistable trip unit may be bypassed when NUCLEAR INSTRUMENT POWER is < 1E-4%. Bypass shall be automatically removed when NUCLEAR INSTRUMENT POWER is ≥ 1E-4% RTP. During testing pursuant to LCO 3.4.16, trips may be bypassed below 5% RTP.
- (c) Bistable trip unit may be bypassed when steam generator pressure is < 785 ~~psig~~ ^{psia}. Bypass shall be automatically removed when steam generator pressure is ≥ 785 ~~psig~~ ^{psia}.
- (d) Bistable trip unit may be bypassed when NUCLEAR INSTRUMENT POWER is < 15% RTP. Bypass shall be automatically removed when NUCLEAR INSTRUMENT POWER is ≥ 15% RTP.
- (e) Trip is only applicable in MODE 1, NUCLEAR INSTRUMENT POWER ≥ 15% RTP.
- (f) CHANNEL CHECK only applies to Wide Range Logarithmic Neutron Flux Monitor.