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## CALVERT CLIFFS NUCLEAR POWER PLANT

May 18, 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  
Application of Limiting Condition for Operation 3.0.5

**REFERENCE:** (a) Letter from Mr. G. H. Gellrich (CCNPP) to Document Control Desk (NRC), dated October 25, 2010, License Amendment Request: Revision of Limiting Condition for Operation 3.0.5

Calvert Cliffs Nuclear Power Plant, LLC (CCNPP) submitted a licensee amendment request (Reference a) requesting a change to the words in Limiting Condition for Operation (LCO) 3.0.5 to clarify the conditions under which LCO 3.0.5 can be used. Limiting Condition for Operation 3.0.5 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. ...." However, there are LCOs where the steps taken to comply with ACTIONS do not involve removing equipment from service or declaring equipment inoperable. Instead the steps taken to comply with ACTIONS include placing a different train into service, repositioning of equipment and other steps that do not match the exact wording of LCO 3.0.5. Listed below are several CCNPP Technical Specifications that do not involve equipment removed from service or declared inoperable in order to comply with ACTIONS.

### TS 3.3.7 (Containment Radiation Signal)

**CONDITION B:** One required Manual Actuation channel or Actuation Logic channel inoperable.

**REQUIRED ACTION:** Place and maintain containment purge and exhaust valves in closed position.

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TS 3.3.8 (Control Room Recirculation Signal)

CONDITION A: CRRS trip circuit or measurement channel inoperable in MODES 1, 2, 3, or 4.  
REQUIRED ACTION: Place one Control Room Emergency Ventilation System train in recirculation mode with the post-loss-of-coolant incident filter fan in service.

TS 3.4.11 (Pressurizer Power-Operated Relief Valves)

CONDITION A: One or two PORVs inoperable and capable of being manually cycled.  
REQUIRED ACTION: Close and maintain power to the associated block valve.

CONDITION C: One block valve inoperable.  
REQUIRED ACTION: Place associated PORV in override closed.

TS 3.7.3 (Auxiliary Feedwater System)

CONDITION A: One steam-driven AFW pump inoperable.  
REQUIRED ACTION: Align remaining OPERABLE steam-driven pump to automatic initiating status.

TS 3.7.8 (Control Room Emergency Ventilation System)

CONDITION A: One or more ducts with one outside air intake isolation valve inoperable in MODE 1, 2, 3, or 4.  
REQUIRED ACTION: Close the OPERABLE outside air intake valve in each affected duct.

Reference (a) proposed to modify the words in LCO 3.0.5 to encompass the steps taken in these ACTIONS and other similar situations. Following discussions with the Nuclear Regulatory Commission (NRC), CCNPP now requests a written interpretation from the NRC as to whether the current wording of LCO 3.0.5 addresses the conditions listed above and other similar situations. Upon receipt of a written interpretation, CCNPP will consider withdrawing Reference (a) from NRC review.

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

Very truly yours,



GHG/KLG/bjd

cc: D. V. Pickett, NRC  
W. M. Dean, NRC  
Resident Inspector, NRC  
S. Gray, DNR