UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 20, 2011

Mr. George H. Gellrich, Vice President
Calvert Cliffs Nuclear Power Plant, LLC
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

SUBJECT: TECHNICAL SPECIFICATION INTERPRETATION FOR CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 & 2 ON LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY LCO 3.0.5 (TAC NOS. ME6311 AND ME6312)

Dear Mr. Gellrich:

By letter dated May 18, 2011, Calvert Cliffs Nuclear Power Plant, LLC (CCNPP), the licensee, requested a written interpretation from the Nuclear Regulatory Commission (NRC) staff on whether the current wording of Technical Specification (TS) LCO 3.0.5 addresses the required actions for conditions related to TS 3.3.7, "Containment Radiation Signal," TS 3.3.8, "Control Room Recirculation Signal," TS 3.4.11, "Pressurizer Power-Operated Relief Valves," TS 3.7.3, "Auxiliary Feedwater System," and TS 3.7.8, "Control Room Emergency Ventilation System." The licensee requested the TS interpretation to ensure LCO 3.0.5 will be uniformly applied at CCNPP.

LCO 3.0.5 allows equipment removed from service or declared inoperable to comply with TS Actions to be returned to service under administrative control solely to perform testing required to demonstrate its Operability or the Operability of other equipment. The TS interpretation would extend the allowances of LCO 3.0.5 to apply to equipment placed into service to comply with TS Actions or repositioned to comply with TS Actions.

The NRC staff reviewed the interpretation in accordance with NRC Inspection Manual, Part 9900: Technical Guidance, Chapter STSINTR, "Licensee Technical Specification Interpretations." Enclosed is the staff's interpretation of CCNPP LCO 3.0.5 as it pertains to the identified CCNPP TSs. Please contact me at 301-415-1364 if you have any questions.

Sincerely,

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosure:
As stated

cc w/encl: Distribution via Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

OFFICE OF NUCLEAR REACTOR REGULATION

TECHNICAL SPECIFICATION INTERPRETATION

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

LIMITING CONDITION FOR OPERATION (LCO) 3.0.5 APPLICABILITY

1.0 INTRODUCTION

By letter dated May 18, 2011 (Agencywide Document Access and Management System (ADAMS) Accession No. ML11145A085), Calvert Cliffs Nuclear Power Plant, LLC (CCNPP), the licensee, requested an interpretation from the Nuclear Regulatory Commission (NRC) as to whether the current wording of LCO 3.0.5 addresses the equipment removed from service or declared inoperable to comply with Technical Specification (TS) ACTIONS for the following subset of CCNPP TSs Required Actions:

- TS 3.3.7, Containment Radiation Signal. For the Condition of one required Manual Actuation channel or Actuation Logic channel inoperable, Required Action B.1 requires: "Place and maintain containment purge and exhaust valves in closed position;"

- TS 3.3.8, Control Room Recirculation Signal (CRRS). For the Condition of CRRS trip circuit or measurement channel inoperable in MODE 1, 2, 3, or 4, Required Action A.1 requires: "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 (PORVs). For the Condition of one or two PORVs inoperable and capable of being manually cycled, Required Action A.1 requires: "Close and maintain power to the associated valve," and Required Action C.1 requires: "Place associated PORV in override closed;"

- TS 3.7.3, Auxiliary Feedwater System (AFW). For the Condition of one steam-driven AFW pump inoperable Required Action A.1 requires: "Align remaining OPERABLE steam-driven pump to automatic initiating status;" and

- TS 3.7.8, Control Room Emergency Ventilation System. For the Condition of one or more ducts with outside air intake isolation valve inoperable in MODE 1, 2, 3, or 4, Required Action A.1 requires: "Close the OPERABLE outside air intake valve in each affected duct."

Enclosure

2.0 REGULATORY EVALUATION

The NRC staff reviewed the interpretation in accordance with NRC Inspection Manual, Part 9900: Technical Guidance, Chapter STSINTR, "Licensee Technical Specification Interpretations."

CCNPP converted to the improved standard TSs by license amendment dated May 4, 1998 (ADAMS ML010520026). As a result, LCO 3.0.5 and its Bases are consistent with the NRC's improved TSs in NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants, Revision 3."

3.0 TECHNICAL EVALUATION

Licensee Position

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. The licensee explained that in CCNPP TS 3.3.7, Containment Radiation Signal and TS 3.7.3, AFW, the steps taken to comply with ACTIONS involves the placement of redundant or alternate equipment or trains into service, or the repositioning (e.g., opening or closing) of components. Hence, the licensee believes CCNPP TSs Required Actions do not fit into the words currently contained in LCO 3.0.5, i.e., the required actions in these specifications do not involve "Equipment removed from service or declared inoperable to comply with ACTIONS ...."

Applicable Regulatory Position

The NRC staff reviewed the CCNPP TSs, the applicable staff position contained in NUREG-1432 and the staff position on Technical Specification Task Force (TSTF)-001, Revision 1 provided in a status letter on Traveler Packages from C. Grimes (NRC) to J. Davis, Nuclear Energy Institute, dated September 27, 1996 (ADAMS 9610030183), and concluded that the current wording of LCO 3.0.5 addresses the required actions for conditions related to TSs Actions 3.3.7.B.1, 3.3.8.A.1, 3.4.11.A.1, 3.4.11.C.1, 3.7.3.A.1, and 3.7.8.A.1. The staff notes that CCNPP LCO 3.0.5 requirements and Bases have the same content as the staff's regulatory positions in NUREG-1432.

The pertinent CCNPP TSs are as follows:

1. Limiting Condition for Operation 3.0.5

   > 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.

2. Bases for LCO 3.0.5

Limiting Condition for Operation 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate either:

a. The OPERABILITY of the equipment being returned to service, or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service (in conflict with the requirements of the ACTIONS) is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

NRC Staff Guidance

LCO 3.0.2 requires that upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. Per LCO 3.0.2, there are only two ways to exit an LCO unless otherwise specified elsewhere in the TS. Either the inoperable system must be restored to operable status, in which case, the LCO is met; or the plant is placed into a condition where the LCO no longer applies.

The purpose of LCO 3.0.5 is to ensure that equipment can be returned to service so that restoration of LCO compliance can be demonstrated before the Condition is exited without being in non-compliance with TSs. LCO 3.0.5 specifically grants an exception to LCO 3.0.2 because it is recognized that returning equipment to service for the purpose of demonstrating OPERABILITY may prevent the licensee from maintaining full compliance with Required Actions while performing the tests.

More specifically, as stated in LCO 3.0.5, the exception is granted to the system being returned to service in order to demonstrate OPERABILITY. As a result, LCO 3.0.2 allows a system to be returned to service in contradiction to applicable TS Required Actions solely to allow the performance of required testing to demonstrate either: 1) the OPERABILITY of the equipment being returned to service, or 2) the OPERABILITY of other equipment. This is supported by both the wording of the LCO and the Bases cited above. Because of this exception, the licensee may return a system or component to service in direct contradiction to the applicable Required Actions solely to perform the required testing to demonstrate OPERABILITY.

As noted in the Bases, the "administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing." Accordingly, it is the staff's position that LCO 3.0.5 would apply in all cases to systems or components in Section 3 of the licensee's TSs, including the systems specified in the licensee's May 18, 2011, letter.

4.0 CONCLUSION

The NRC staff concludes that CCNPP TS Required Action 3.3.7.B.1, 3.3.8.A.1, 3.4.11.A.1, 3.4.11.C.1, 3.7.3.A.1, and 3.7.8.A.1 are within the scope of the administrative controls applied by LCO 3.0.5 for the purpose of realignment of components needed for conducting the operability testing on equipment, so long as the testing could not be conducted while relying on TS Required Actions. This includes the repositioning of redundant or alternate equipment or trains previously manipulated to comply with the TS Required Action. The staff further concludes that LCO 3.0.5 would apply in all cases to systems or components in Section 3 of the licensee's TSs.

Principal Contributor: C. Schulten, NRR

Date: December 20, 2011

December 20, 2011

Mr. George H. Gellrich, Vice President
Calvert Cliffs Nuclear Power Plant, LLC
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

SUBJECT: TECHNICAL SPECIFICATION INTERPRETATION FOR CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 & 2 ON LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY LCO 3.0.5 (TAC NOS. ME6311 AND ME6312)

Dear Mr. Gellrich:

By letter dated May 18, 2011, Calvert Cliffs Nuclear Power Plant, LLC (CCNPP), the licensee, requested a written interpretation from the Nuclear Regulatory Commission (NRC) staff on whether the current wording of Technical Specification (TS) LCO 3.0.5 addresses the required actions for conditions related to TS 3.3.7, "Containment Radiation Signal," TS 3.3.8, "Control Room Recirculation Signal," TS 3.4.11, "Pressurizer Power-Operated Relief Valves," TS 3.7.3, "Auxiliary Feedwater System," and TS 3.7.8, "Control Room Emergency Ventilation System." The licensee requested the TS interpretation to ensure LCO 3.0.5 will be uniformly applied at CCNPP.

LCO 3.0.5 allows equipment removed from service or declared inoperable to comply with TS Actions to be returned to service under administrative control solely to perform testing required to demonstrate its Operability or the Operability of other equipment. The TS interpretation would extend the allowances of LCO 3.0.5 to apply to equipment placed into service to comply with TS Actions or repositioned to comply with TS Actions.

The NRC staff reviewed the interpretation in accordance with NRC Inspection Manual, Part 9900: Technical Guidance, Chapter STSINTR, "Licensee Technical Specification Interpretations." Enclosed is the staff's interpretation of CCNPP LCO 3.0.5 as it pertains to the identified CCNPP TSs. Please contact me at 301-415-1364 if you have any questions.

Sincerely,
/ra/
Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318
Enclosure:
As stated
cc w/encl: Distribution via Listserv

DISTRIBUTION:

PUBLIC	LPL1-1 r/f	RidsNrrDorlLpL1-1	RidsRegion3MailCenter
RidsNrrPMCalvertCliffs	RidsOgcMailCenter	RidsAcrsAcnwMailCenter	RidsRegion4MailCenter
RidsNrrDssStsb	CSchulten, NRR	RidsRegion1MailCenter	
RidsNrrLASLittle	GDentel, R1	RidsRegion2MailCenter	

ADAMS Accession No.: ML112940645

OFFICE	LPL1-1/PM	LPL1-1/LA	STSB/BC	OGC	Region 1	OE	LPL1-1/BC
NAME	DPICKETT	SLittle by email dated	RBElliott	NLO MSpencer	GDentel via email	GGulla for NHilton	NSalgado
DATE	11 / 08 / 11	10 / 28 / 11	12/ 19 /2011	11 / 08 / 11	12/ 05 / 11	11/ 21 / 11	12 / 20 / 11

OFFICIAL RECORD COPY