

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 22, 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:

REQUEST FOR ADDITIONAL INFORMATION REGARDING DIESEL

GENERATOR SURVEILLANCE REQUIREMENT 3.8.1.11 - CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 (TAC NOS. ME6831 AND

ME6832)

Dear Mr. Gellrich:

By letter dated August 8, 2011 (Agencywide Documents Access and Management System Accession No. ML11222A020), Calvert Cliffs Nuclear Power Plant, LLC proposed a license amendment to revise Technical Specification (TS) 3.8.1, "AC Sources – Operating," for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2. The proposed amendment would modify TS Surveillance Requirement (SR) 3.8.1.11 by revising the required power factor value to be achieved by the diesel generators during conduct of the surveillance test. The change would also modify a note associated with SR 3.8.1.11.

The Nuclear Regulatory Commission staff has concluded that additional information will be required in order to continue its review. As discussed with your staff, we understand that you intend to respond to the enclosed request for additional information within 45 days of the date of this letter.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,

Douglas V. Pickett, Senior Project Manager

Plant Licensing Branch I-1

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Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosure: As stated

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

REQUEST FOR ADDITIONAL INFORMATION

DIESEL GENERATOR SURVEILANCE REQUIREMENT 3.8.1.11

In order to demonstrate each diesel generator's (DG's) ability to perform its safety function, Surveillance Requirement (SR) 3.8.1.11 requires the DGs to be loaded to the maximum postulated accident loading (kW and kVAR). The mission time of the DGs is typically greater than 20 days. The amendment request states that the correct power factor values based on design-basis calculations were not incorporated during transition to the Improved Technical Specifications. According to SR 3.8.1.11, the DGs are tested for \geq 60 minutes while loaded to \geq 4000 kW for DG 1A and \geq 3000 kW for DGs 1B, 2A, and 2B. This SR is performed once every 24 months.

- 1. Provide a summary of DG loading calculations which detail the real and reactive power loading of the DGs for the postulated accidents. Identify loads that may be manually added via plant-controlled procedures during the postulated worst case events. Verify that the loading calculation includes any impact on the DG loading due to variation in voltage and frequency that is allowable for steady state DG operation and any effects of large pumps operating at run out conditions at the onset of an event.
- 2. SR 3.8.1.11 requires testing for ≥ 60 minutes to ensure the DG's ability to perform its safety function. However, operating experience at some plants with 24-hour surveillance times has identified some weaknesses in the DG systems which would not have been identified if the SR was performed for a lesser duration. Regulatory Guide 1.9, "Application and Testing of Safety-Related Diesel Generators in Nuclear Power Plants," also recommends testing of emergency DGs for 22 hours at nominal rating, and 2 hours at the short term overload capability.

Provide justification for not adopting the current regulatory guidance for DG testing.

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