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a joint venture of



CALVERT CLIFFS
NUCLEAR POWER PLANT

July 18, 2012

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
Revision to a Response to Request for Additional Information Regarding Diesel
Generator Surveillance Requirement 3.8.1.11

REFERENCES:

- (a) Letter from Mr. G. H. Gellrich (CCNPP) to Document Control Desk (NRC), dated August 8, 2011, License Amendment Request: Diesel Generator Surveillance Requirement 3.8.1.11 Revision
- (b) Letter from Mr. G. H. Gellrich (CCNPP) to Document Control Desk (NRC), dated January 11, 2012, Responses to Request for Additional Information Regarding Diesel Generator Surveillance Requirement 3.8.1.11

In Reference (a), Calvert Cliffs Nuclear Power Plant, LLC submitted a license amendment request to revise Technical Specification Surveillance Requirement 3.8.1.11 by revising the required power factor value to be achieved by the diesel generators during conduct of the surveillance test. In Reference (b), Calvert Cliffs responded to the Nuclear Regulatory Commission's request for additional information (RAI) to support their review of Calvert Cliffs' license amendment request. Attachment (1) provides a revision to our response to RAI #2 which replaces the response originally provided for RAI #2 in Reference (b). The revision is denoted by a revision bar in the right-hand margin.

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ATTACHMENT (1)

**CALVERT CLIFFS REVISED RESPONSE TO NRC REQUEST FOR
ADDITIONAL INFORMATION #2**

ATTACHMENT (1)

**CALVERT CLIFFS REVISED RESPONSE TO NRC REQUEST FOR ADDITIONAL
INFORMATION #2**

This response to Request for Additional Information (RAI) #2 replaces our previous response to RAI #2 that was submitted on January 11, 2012 (Reference 1).

NRC RAI #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 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.

CCNPP Response #2:

Although not part of Calvert Cliffs' Technical Specifications, there are times when the DGs are run for greater than a one hour period. They include:

- Performances of a four hour run of each DG approximately every two years. This is generally done following performance of a major engine inspection of the DGs.
- Performance of a bearing run-in on the 1A DG approximately every eight years. This run requires approximately 11 hours of operation at various loads, up to full load.
- Performance of a multi-hour run when a main bearing on one of the three Fairbanks Morse DGs is disturbed.
- Performances of a four hour run if any of the Fairbanks Morse DGs are started without pre-lubrication.
- Performance of an extended run following DG maintenance as part of the post-maintenance testing plan. The test runs and durations are determined based on the scope and nature of the maintenance performed. An extended run provides the opportunity to identify any latent failure mechanism that may be introduced during maintenance. In fact, following recent maintenance, one of the DGs was run for at least 24 hours as part of the post-maintenance testing.

While we believe there is a benefit to performing appropriate testing following DG maintenance, including endurance runs, we also consider that the testing scope and duration should be based on the maintenance activities performed. This could result in testing up to a 24 hour duration run, as well as shorter runs.

On several occasions the Surveillance Requirements for the DGs have been reviewed and approved, by the Nuclear Regulatory Commission. This includes Reference 2, which approved a revised electrical plant distribution configuration and the Surveillance Requirements and Limiting Conditions for Operation for our new safety related DG (DG 1A). Later, during Calvert Cliffs' transition to Improved Technical Specifications, the DG Surveillance Requirements were again reviewed, but not changed (Reference 3).

Note that this amendment request is to correct an existing, non-conservative error by aligning the power factor value listed in Surveillance Requirement 3.8.1.11 to the power factor contained in the design calculation. We are not seeking a voluntary change to the licensing basis; rather we have submitted this change in accordance with Reference 4.

ATTACHMENT (1)

**CALVERT CLIFFS REVISED RESPONSE TO NRC REQUEST FOR ADDITIONAL
INFORMATION #2**

REFERENCES

1. Letter from Mr. G. H. Gellrich (CCNPP) to Document Control Desk (NRC), dated January 11, 2012, Responses to Request for Additional Information Regarding Diesel Generator Surveillance Requirement 3.8.1.11
2. Letter from D. G. McDonald (NRC) to C. H. Cruse (CCNPP), dated April 2, 1996, Issuance of Amendments for Calvert Cliffs Nuclear Power Plant (Amendments 214, Unit 1 and 191, Unit 2)
3. Letter from A. W. Dromerick (NRC) to C. H. Cruse (CCNPP), dated May 4, 1998, Issuance of Amendments for Calvert Cliffs Nuclear Power Plant (Amendments 227, Unit 1 and 201, Unit 2)
4. NRC Administrative Letter 98-10, dated December 29, 1998, Dispositioning of Technical Specifications That are Insufficient to Assure Plant Safety