



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

May 31, 2013

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: CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 -
REQUEST FOR ADDITIONAL INFORMATION REGARDING ADOPTION OF
TSTF-501-A, REVISION 1, "RELOCATE STORED FUEL OIL AND LUBE OIL
VOLUME VALUES TO LICENSEE CONTROL" LICENSE AMENDMENT
(TAC NO. ME9794 AND ME9795)

Dear Mr. Gellrich:

By letter dated October 2, 2012, as supplemented by letter dated November 26, 2012, Calvert Cliffs Nuclear Power Plant, LLC submitted a license amendment request to revise Technical Specification (TS) 3.8.3 "Diesel Fuel Oil" by relocating the current stored diesel fuel oil numerical volume requirements from the TS to the TS Bases and TS 3.8.1 "AC Sources-Operating" by relocating the specific numerical value for the day tank fuel oil volume from the TS to the TS Bases for Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2. The changes would be consistent with Nuclear Regulatory Commission (NRC)-approved Industry TS Task Force Standard TS Change Traveler 501-A, Revision 1.

The NRC staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). The NRC staff is requesting a response to the RAI within 30 days of the date of this letter.

If you have any questions regarding this issue, please contact me at (301) 415-1016.

Sincerely,

A handwritten signature in black ink, appearing to read "Nadiyah S. Morgan", written over a horizontal line.

Nadiyah S. Morgan, 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:
RAI

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING ADOPTION OF TSTF-501-A, REVISION 1
LICENSE AMENDMENT REQUEST
CALVERT CLIFFS NUCLEAR POWER PLANT, LLC.
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-317 AND 50-318

By letter dated October 2, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12278A012), as supplemented by letter dated November 26, 2012 (ADAMS Accession No. ML12333A316), Calvert Cliffs Nuclear Power Plant, LLC, the licensee, submitted a license amendment request (LAR) to revise Technical Specification (TS) 3.8.3 "Diesel Fuel Oil" by relocating the current stored diesel fuel oil numerical volume requirements from the TS to the TS Bases and TS 3.8.1 "AC Sources-Operating" by relocating the specific numerical value for the day tank fuel oil volume from the TS to the TS Bases for Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (Calvert Cliffs). The changes would be consistent with Nuclear Regulatory Commission (NRC)-approved Industry TS Task Force (TSTF) Standard TS Change Traveler 501-A, Revision 1. In order to complete its review, the NRC staff requests the following information:

1. The LAR identifies a deviation from TSTF-501, in that, the licensee requests a revision to TS 3.8.1, "AC Sources-Operating" using a similar approach to the revision of TS 3.8.3 as described in the TSTF. The revision to TS 3.8.1 involves the modification of Surveillance Requirement (SR) 3.8.1.5 by replacing the specific day tank numerical volume requirement with the requirement to maintain greater than or equal to a one-hour supply of fuel oil. The proposed revision relocates the specific volume needed to support this requirement to the TS Bases. Pursuant to TSTF-501, the modification of SR 3.8.3.1 requires the licensee to make a specific reference to the methods and standards used to calculate the required numerical volume of fuel oil. As such, a similar modification using the same approach as TSTF-501 should contain a similar reference to the methods and standards used to calculate the required numerical volume of fuel oil.

The NRC staff requests that the licensee provide the methods and standards used to calculate the required numerical volume of fuel oil stated in the proposed revision of TS SR 3.8.1.5. If the methods and standards differ from those discussed in TSTF-501, provide a technical justification.

2. The first bullet in Section 2.0 "Proposed Change" states that, "The TS is modified so that Conditions A, B, or C are entered when the stored diesel fuel oil inventory is less than a 7-day supply, but greater than a 6-day supply for a diesel generator." However, in the

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mark-up version of the TS, a unit must enter Condition A when the stored diesel fuel oil inventory is less than a 7-day supply, but greater than a 6-day supply. A unit must enter Conditions B or C whenever the stored diesel fuel oil inventory is less than a 7-day supply (no greater than 6 day bound). This discrepancy affects the time allowed to restore the fuel oil to within required limits before the unit must declare the affected diesel generator (DG) inoperable.

If the licensee modifies the TS as described in Section 2.0, then a fuel oil volume of less than a 6-day supply in the Unit 1 or 2 fuel oil storage tank (FOST) 21 would require entrance into Condition F and result in an immediate declaration of inoperable for the affected DG. However, if the licensee modifies the TS as shown in the TS mark-ups, then the licensee would have up to 48 hours to restore the fuel oil to within the required limit before the unit must declare the affected DG inoperable.

The NRC staff requests that the licensee provide clarification as to how the licensee intends to modify the TS. Specifically, whether a unit must enter Conditions B or C at any range of fuel oil inventory less than a 7-day supply or if a unit must enter Conditions B or C only when the fuel oil inventory is less than a 7-day supply, but greater than a 6-day supply.

3. While reviewing the standby emergency power configuration, the NRC staff noted that DGs 1B, 2A, and 2B all share a fuel oil supply from FOSTs 11 and 21. The TSs require Calvert Cliffs to store a minimum volume of fuel oil in FOST 21 to allow for the continued operation of two DGs (one for each unit) for 7 days. According to the Calvert Cliffs Updated Final Safety Analysis Report (UFSAR), the standby power system design is such that the DGs automatically start and connect to their respective 4.16 kV buses in the event of an under voltage (UV) on those buses. In the event of a tornado onsite that destroys the switchyard and causes a loss of all offsite power, all three generators would automatically start and connect to their respective buses. Also stated in the Calvert Cliffs UFSAR, FOST 11 is not missile protected, and therefore, not credited in the event of a tornado. Consequently, in the event of a tornado that destroys the switchyard and FOST 11, at least one of the three DGs supplied by FOST 21 would have to be unloaded and shutdown to allow FOST 21 to fulfill its safety function (required volume of stored fuel oil can support only 2 DGs for 7 days).

The NRC staff requests that the licensee provide the following information:

- 3.1 When does the licensee shutdown at least one of the three DGs supplied by FOST 21 after an automatic UV startup of the DGs resulting from a tornado?
- 3.2 Provide information on the process or procedures used to remove a DG from service, including time needed to complete procedural steps.
- 3.3 Describe the time required and the process to start and realign the previously shutdown generator given a single failure has occurred in the redundant load group.

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/ra/

Nadiyah S. Morgan, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

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RAI

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ADAMS Accession No: ML13141A689

*See dated memo May 17, 2013

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