

10 CFR 50.90

April 20, 2018

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
Docket Nos. 50-317 and 50-318

Subject: Administrative Change to Technical Specification 5.2.2, Unit Staff

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (Exelon) is submitting a request for amendment to the Technical Specification 5.2.2, Unit Staff. Specifically, the proposed license amendment would delete TS 5.2.2.g.3, related to specific requirements for Shift Technical Advisor personnel education and training. This change is needed to remove a previously accepted means of filling the Shift Technical Advisor role that no longer applies to Calvert Cliffs Nuclear Power Plant. This is an administrative TS change request.

Attachment 1 provides a description of the proposed change including the No Significant Hazards Consideration. Attachment 2 contains the existing Calvert Cliffs mark-up Technical Specifications pages.

There are no regulatory commitments contained in this letter. Exelon requests approval of the proposed license amendment by April 20, 2019, with the amendment being implemented within 60 days.

These proposed changes have been reviewed by the Plant Operations Review Committee.

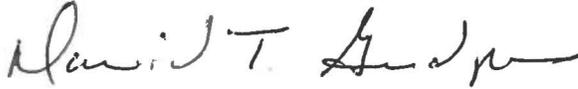
In accordance with 10 CFR 50.91, "Notice for public comment; state consultation," a copy of this application, with attachments, is being provided to the designated State Official.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 20th day of April 2018.

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If you should have any questions regarding this submittal, please contact Enrique Villar at 610-765-5736.

Respectfully,



David T. Gudger
Manager - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1. Evaluation of Proposed Change
2. Marked-up Technical Specification Page

cc: NRC Regional Administrator, Region I w/attachments
NRC Senior Resident Inspector, CCNPP “
NRC Project Manager, NRR, CCNPP “
S. T. Gray, State of Maryland “

ATTACHMENT 1
EVALUATION OF PROPOSED CHANGE

Subject: Administrative Change to Technical Specification 5.2.2, Unit Staff

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 Precedence
 - 4.3 No Significant Hazards Consideration
 - 4.4 Conclusions
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (Exelon), proposes a change to the Calvert Cliffs Nuclear Power Plant (CCNPP) Units 1 and 2 Technical Specifications (TS), Appendix A of Renewed Facility Operating License Nos. DPR-53 and DPR-69.

Specifically, Exelon request to delete TS 5.2.2.g.3 which states:

"...By an SRO license holder previously approved by the Nuclear Regulatory Commission as an exception to the minimum STA education requirements of Specification 5.2.2.g.2, provided the following conditions are met:

- i. With both units in MODE 1, 2, 3, or 4, the STA shall be an SRO license holder in addition to the two SRO license holders required,
- ii. With one unit in MODE 1, 2, 3, or 4, and the other unit in MODE 5 or 6, the STA shall be an SRO license holder other than the SS, and
- iii. With one unit in MODE 1, 2, 3, or 4, and the other unit defueled, the STA shall be an SRO license holder in addition to the one SRO license holder required."

This change is needed to remove a means of filling the Shift Technical Advisor (STA) role that no longer applies to CCNPP. This is an administrative TS change request.

The marked up Technical Specification page is provided in Attachment 2.

2.0 DETAILED DESCRIPTION

TS 5.2.2.g defines the education and experience requirements for personnel filling the STA position during operation of either Unit in Modes 1, 2, 3, or 4. It provides three permissible means to fill the STA position.

TS 5.2.2.g.1 and 5.2.2.g.2 outline requirements consistent with the Commission Policy Statement on Engineering Expertise on Shift (Reference 1) and are consistent with similar requirements in the Improved Standard Technical Specifications (NUREG 1432, Rev 4).

TS 5.2.2.g.3 is unique to Calvert Cliffs and allows a Senior Reactor Operators (SRO) license holder previously approved by the Nuclear Regulatory Commission (NRC) as an exception to the minimum education requirements to fill the STA position with certain conditions.

The last of the four SRO license holder previously approved by the NRC to fill the STA position under the requirements of TS 5.2.2.g.3 has retired and the license has been removed from the active files for Calvert Cliffs. Therefore, Exelon requests that TS 5.2.2.g.3 be removed from TS 5.2.2.g since it is no longer needed or necessary. This is an administrative change.

3.0 TECHNICAL EVALUATION

Historical background

NUREG 0737, Item I.A.1.1, Shift Technical Advisor, required licensees to institute a Shift Technical Advisor (STA) program. CCNPP implemented the required program. The NRC reviewed the program and concluded that the training portion of the program was acceptable (Reference 2).

In Reference 3, Calvert Cliffs described the training program at that time and clarified that STA training was given to all shift supervisors and Senior Control Room Operators, as well as who constituted a new hire to the STA program.

During this transition period, Calvert Cliffs had four individuals who were promoted to Senior Control Room Operators and were incumbent in that position before NRC's position concerning new hires was issued. Therefore, these four Senior Control Room Operators were not considered new hires to the STA program, and Calvert Cliffs continued their training and put them into the shift rotation as STA's following completion of the training. However, the NRC also indicated that new hires to the STA program were expected to have a bachelor's degree or equivalent in a scientific or engineering discipline, as required by the regulations.

Based on the additional training received and experience, NRC accepted these four individuals as STAs even though they did not have a bachelor's degree or equivalent in a scientific or engineering discipline. The current TS 5.2.2.g.3 approved by the NRC in License Amendment 216 (Unit 1) and 193 (Unit 2) (Reference 4) based on a License Amendment Request (LAR) (Reference 5) reflects this approval. This LAR was part of a larger TS Amendment to update the TS Administrative Section consistent with Reference 6.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirement/Criteria

The proposed change has been evaluated to determine compliance with applicable regulatory requirements. Following implementation of the proposed TS change, Calvert Cliffs will remain in compliance with applicable regulations and requirements.

NUREG 0737, Item I.A.1.1, Shift Technical Advisor, required licensees to institute a STA program. CCNPP implemented the required program which conforms to Generic Letter 86-04. TS 5.2.2.g.1 and TS 5.2.2.g.2 continue to conform to this requirement after the requested TS change. This change is administrative in nature.

4.2 Precedence

None

4.3 No Significant Hazards Consideration

This proposed change deletes Technical Specification (TS) 5.2.2.g.3. This change is needed to remove a means of filling the Shift Technical Advisor (STA) role that no longer applies to Calvert Cliffs Nuclear Power Plant (CCNPP). TS 5.2.2.g.3 is unique to CCNPP and allows a Senior Reactor Operator license holder previously approved by the Nuclear Regulatory Commission (NRC) as an exception to the minimum education requirements to fill the STA position with certain conditions. This means of filling the STA position is no longer needed. Therefore, Exelon requests that this means be removed from TS 5.2.2.g. This is an administrative change.

Exelon has evaluated the proposed amendment to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.52, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

The proposed amendment removes one of three permissible means for filling the STA position. TS 5.2.2.g defines the education and experience requirements for personnel filling the STA position during operation of either Unit in Modes 1, 2, 3, or 4. It provides three permissible means to fill the STA position. One of those means (TS 5.2.2.g.3) is unique to CCNPP and is no longer needed. The remaining requirements (TS 5.2.2.g.1 and TS 5.2.2.g.2) for filling the STA position meet the guidance provided in Generic Letter 86-04, Policy Statement on Engineering Expertise on Shift. This is an administrative change.

This change does not involve any change to the design basis of the plant or of any structure, system or component. As a result, there is no change to the probability or consequences of any previously evaluated accident.

Therefore, the operation of the facility in accordance with the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident form any previously evaluated?

Response: No

The proposed amendment removes one of three permissible means for filling the STA position. TS 5.2.2.g defines the education and experience requirements for personnel filling the STA position during operation of either Unit in Modes 1, 2, 3, or 4. It provides three permissible means to fill the STA position. One of those means (TS 5.2.2.g.3) is unique to CCNPP and is no longer needed. The remaining requirements (TS 5.2.2.g.1 and TS 5.2.2.g.2) for filling the STA position meet the guidance provided in Generic Letter 86-04, Policy Statement on Engineering Expertise on Shift. This is an administrative change.

This change does not involve any change to the design basis of the plant or of any structure, system or component. The proposed amendment does not impose any new or different requirements. The change does not alter assumptions made in the safety analyses. The proposed change is consistent with the safety analyses assumptions and current plant operating practice.

Therefore, the operation of the facility in accordance with the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed amendment removes one of three permissible means for filling the STA position. TS 5.2.2.g defines the education and experience requirements for personnel filling the STA position during operation of either Unit in Modes 1, 2, 3, or 4. It provides three permissible means to fill the STA position. One of those means (TS 5.2.2.g.3) is unique to CCNPP and is no longer needed. The remaining requirements (TS 5.2.2.g.1 and TS 5.2.2.g.2) for filling the STA position meet the guidance provided in Generic Letter 86-04, Policy Statement on Engineering Expertise on Shift. This is an administrative change.

This change does not involve any change to the design basis of the plant or of any structure, system or component. As a result, there is no decrease in any margin of safety due to this proposed change.

Therefore, operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not inimical to the common defense and security or the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve: (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. Generic Letter 86-04, Policy Statement on Engineering Expertise on Shift.
2. Letter from R. A. Clark (NRC) to A. E. Lundvall (BGE), dated July 9, 1982, NUREG 0737, Item I.A.1.1, Shift Tech Advisor.
3. Letter from A. E. Lundvall (BGE) to Document Control Desk (NRC), dated January 4, 1983, Shift technical Advisor (STA).
4. Letter from A. W. Dromerick (NRC) to C. H. Cruse (BGE), dated August 26, 1996, Issuance of Amendment for Calvert Cliffs Nuclear Power Plant (License Amendment 216 (Unit 1) and 193 (Unit 2)).
5. Letter from R. E. Denton (BGE) to Document Control Desk (NRC), dated March 15, 1995, License Amendment Request: Administrative Controls Section 6.0 Upgrade and QA Policy Change.
6. Letter from W. T. Russell (NRC) to Improved Tech Spec Owners Group Chairpersons, dated October 25, 1993, Content of Standard Technical Specifications, Section 5.0, Administrative Controls.

Marked-up Technical Specification Page

5.2 Organization

2. By an individual with a Bachelors Degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant transient and accidents; or

~~3. By an SRO license holder previously approved by the Nuclear Regulatory Commission as an exception to the minimum STA education requirements of Specification 5.2.2.g.2, provided the following conditions are met:~~

- ~~i. With both units in MODE 1, 2, 3, or 4, the STA shall be an SRO license holder in addition to the two SRO license holders required,~~
 - ~~ii. With one unit in MODE 1, 2, 3, or 4, and the other unit in MODE 5 or 6, the STA shall be an SRO license holder other than the SS, and~~
 - ~~iii. With one unit in MODE 1, 2, 3, or 4, and the other unit defueled, the STA shall be an SRO license holder in addition to the one SRO license holder required.~~
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