

BALTIMORE GAS AND ELECTRIC COMPANY

GAS AND ELECTRIC BUILDING
BALTIMORE, MARYLAND 21203

January 12, 1979

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Mr. Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Subject: Calvert Cliffs Nuclear Power Plant
Unit No. 1 & 2, Docket No. 50-317 & 50-318
Containment Purging During Normal Plant Operation
Reference: NRC letter dated November 29, 1978 from
R.W. Reid to A. E. Lundvall, Jr., same subject

Gentlemen:

The referenced letter requested that we either commit to cease all containment purging during hot shutdown, hot standby, startup and power operation or that we provide a justification for continuing purging. If we chose to do the latter, we were also to demonstrate that the purge isolation valves would close under postulated design basis accident conditions. In addition, we were to propose a Technical Specification governing our intended purging operations, and we were to provide a schedule for completion of our (formal) evaluation justifying continued (limited) purging during power operation. Pending NRC's review of this evaluation, we were to either cease (or limit to an absolute minimum) purging.

An additional related requirement of the referenced letter was for us to review the design of all safety actuation signal circuits which have manual overrides to ensure that overriding one signal does not disable other safety functions and that all manual overrides are adequately annunciated and contain sufficient physical features to allow adequate administrative control.

The following information is provided relative to your letter:

1. We intend to continue purging on a limited basis not to exceed 90 hours per year;
2. A draft technical specification to cover limited purging has been developed and is enclosed for your review and comments;

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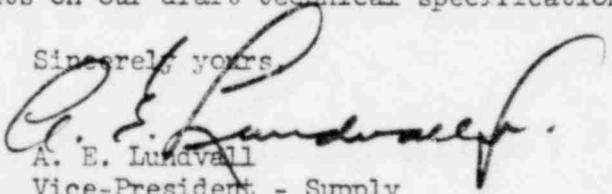
3. The Purge Air Isolation Valves were purchased under a design specification calling for closure of the valves against design basis LOCA conditions & a certificate of compliance to the design specification was issued by the vendor;
4. Although purging is not relied on as the primary means of reducing containment temperature and humidity, the ability to purge on a limited basis is both necessary and justified. Operating experience has shown that containment access, for routine purposes such as taking readings or samples as well as for maintenance and for unplanned reasons, is often only possible after purging to reduce temperature or radioactivity levels.
5. As requested, we have conducted a review of "the design of all safety actuation signal circuits which incorporate a manual override feature". During the initial design of the plant, the use of the manual override feature was kept to a minimum. Additionally, an effort was made to annunciate such overrides where practical. Consequently, most safety actuation signals cannot be manually overridden, and the major portion of those which can be overridden conform to the guidance in your letter of having physical features for administrative control and of being annunciated. However, there are several exceptions, which are listed below. These are being carefully evaluated to determine what actions are necessary to preclude improper use of the override feature.
 - a. Switchgear Room air-conditioning compressor
 - b. Control Room air-conditioning compressor
 - c. Boric Acid pumps
 - d. Diesel Generator feeder breakers
 - e. #12 & #22 Service Water Heat Exchangers Salt Water Inlet Valves
 - f. #12 & #22 Component Cooling Water Heat Exchangers Salt Water Inlet Valves

We intend to complete our evaluation of these components and to submit any resultant design or procedural modifications for your review within 90 days. In the meantime, we will use administrative controls to prevent improper use of these overrides.

6. Your letter, specifically the last sentence of paragraph (2), stated that we should provide a schedule for completion of an evaluation justifying continued limited purging during power operation. It is unclear to us what is being requested. However, pending your review of the information submitted herein we intend to limit purging to an absolute minimum, not to exceed 90 hours per year.

We hope this reply is responsive to the intended requirements of your letter. Please do not hesitate to contact us if you need additional information or if you have comments on our draft technical specification.

Sincerely yours,


A. E. Lundvall
Vice-President - Supply

cc - J. A. Biddison, Esquire
G. F. Trowridge, Esquire

J. W. Brothers (Bechtel)
P. W. Kruse (CE)
E. L. Conner, Jr. (NRC)

CONTAINMENT SYSTEMS

3/4.6.7 Containment Purge System

LIMITING CONDITION FOR OPERATION

3.6.7.1 The automatic isolation valves in the containment purge lines may be opened for a maximum of 90 hours per calendar year.

APPLICABILITY: Modes 1, 2 and 3*

ACTION:

With any containment purge automatic isolation valve open for greater than 90 hours in one calendar year, close the open valve (s) within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

*With pressurizer pressure \geq 1750 psia