



LER NO. 80-22/1T  
DOCKET NO. 50-317  
EVENT DATE 04/15/80  
REPORT DATE 04/25/80  
ATTACHMENT

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES:

Mr. Monte Conner of the Division of Project Management informed Baltimore Gas & Electric by telephone on April 15, 1980, of a possible generic deficiency in FSAR Safety Analysis Section 14.3 (Boron Dilution Incident) which may apply to Calvert Cliffs Units 1 & 2 (Docket Nos. 50-317, 50-318), T.S. 6.9.1.8.h. The boron dilution incident analysis does not analyze for the case when the Reactor Coolant System may be drained to the middle of the hot leg with a 1% shutdown margin. This condition may occur while performing maintenance on the Reactor Coolant System at a time when the reactor is not in a refueling mode.

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS:

Baltimore Gas & Electric has determined that the above condition has not been analyzed and that a 1% shutdown margin while operating in the above condition may not provide a sufficient margin of safety; therefore, operating procedures have been changed to require a minimum of a 2% shutdown margin or insure all sources of nonborated water are restricted to a flow rate of equal to or less than 88 gpm which will provide an adequate safety margin. In addition, a Technical Specification amendment has been applied for T.S. 3.1.1.3 (shutdown margin  $\leq 200^{\circ}\text{F}$ ) to require a shutdown margin of  $\geq 2\% \Delta k/k$  or sources of nonborated water shall be  $\leq 88$  gpm when the RCS volume is less than 9600 ft<sup>3</sup>.