

April 16, 1980

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TO: Mr. E. C. McCabe, U.S. Nuclear Regulatory Commission
FROM: S. M. Davis , Baltimore Gas & Electric Company
SUBJECT: Generic Deficiency and FSAR Safety Analysis Section 14.3
(Boron Dilution Incident)

The information included herein confirms our verbal conversation of April 15, 1980, with your Mr. R. E. Architzel on the same subject.

Mr. Monty 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. The boron dilution incident analysis does not analyze for the case when the Reactor Coolant System (RCS) 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.

Baltimore Gas & Electric has determined that the above condition has not been analyzed for and that a 1% shutdown margin while operating in the above condition may not provide sufficient margin of safety; therefore, operating procedures will be changed to require a minimum of a 2% shutdown margin which provides an adequate safety margin or insure all sources of a dilution water are isolated and tagged when the Reactor Coolant System is drained for maintenance. More detailed information regarding further corrective action will be provided in the fourteen-day follow-up report.

S. M. Davis
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