



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NOS. 46 AND 29 TO
FACILITY OPERATING LICENSE NOS. DPR-53 AND DPR-69
BALTIMORE GAS AND ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-317 AND 50-318

Introduction

By applications dated July 24, 1979 and January 22, 1980, Baltimore Gas and Electric Company (BG&E or the licensee) requested amendments to Facility Operating License Nos. DPR-53 and DPR-69 for the Calvert Cliffs Nuclear Power Plant (CCNPP), Unit Nos. 1 and 2. The amendments requested consist of changes to the Technical Specifications (TS) to:

- A.1 allow deferral of the next required visual inspection of inaccessible hydraulic snubbers on Unit 2;
- A.2 correct Unit 2 AC electric bus designations operability requirements;
- A.3 increase the inspection interval for the spray system nozzles;
- A.4 incorporate the proposed 10 CFR 50 Appendix I requirements;
- A.5 update organization charts and safety committee membership to include new Production Maintenance Department;
- A.6 delete Environmental TS requirement for aquatic chemistry, productivity, plankton and adenosine triphosphate (ATP) entrainment studies;
- B.1 clarify quality assurance (QA) record retention requirements;
- B.2 modify visual inspection requirements for critical hose stations inside the containment;

- B.3 add auxiliary feedwater system and actuation circuitry requirements;
- B.4 correct NFPA Code typographical error:
- B.5 delete 15 snubbers on non-safety related piping from Table 3.7-4 for Unit 1;
- B.6 add safety related snubber 1-64-35 to Unit 1 listing;
- B.7 add four safety related snubbers to Table 3.7-4 for Unit 2, and
- B.8 add two safety related snubbers to listing for Unit 2.

The proposed changes are for both units unless indicated otherwise. The letters A and B denote requests made by letters dated July 24, 1979 and January 22, 1980, respectively.

Items A.5, B.1, and B.4 were completed and documented in Amendment Nos. 43 and 26 issued July 31, 1980.

Items A.4, A.6, and B.3 will be considered at a later date after our review has been completed.

Discussion and Evaluation

A.1 Hydraulic Snubber Inspection

BG&E has informed the staff that this change is no longer required as the inspection has been completed. We, therefore, should consider this request withdrawn.

A.2 AC Electrical Bus Designation

The present Unit 2 TS operability requirement (TS 3.8.2.1) contains an incorrect bus designation. The BG&E application requested a correction to be compatible with the correct Unit No. 1 specification. We find this administrative correction acceptable.

A.3 Containment Spray System Nozzle Testing

This request is to change the frequency of verifying the open flow path of the containment spray header from five years to ten years. BG&E states that this request is based on a change in the Winter 1977 Addenda of Section XI ASME Code, IWC-5222(c), "System Hydrostatic Test". The change in this Code was intended to make the TS surveillance requirement for performing one of the open spray header flow path tests coincidental with the Code required 10-year

hydrostatic test requirement. It was not intended to extend the period of time for verification of the open spray nozzle flow path. In a discussion with the BG&E staff, it was agreed that this change was not appropriate. We, therefore, should consider this request withdrawn.

A.4 10 CFR 50 Appendix I

By letter dated March 15, 1979, BG&E submitted their proposed TS to meet the 10 CFR 50 Appendix I requirements. These proposed TS will be reviewed against our requirements and issued later when the Appendix I review is complete.

A.6 Environmental Studies

This request is to delete the requirements for aquatic chemistry, productivity, plankton and ATP entrainment studies in the common Environmental Technical Specifications. This proposed change will be considered at a later time.

B.2 Containment Hose Stations

This BG&E request is to change the wording of TS 4.7.11.4 so that the visual inspection of the six critical hose stations inside the containment of each unit need not be performed every 31 days during reactor operation. BG&E states that since the containment is a restricted area during reactor operation the probability of equipment tampering or degradation is greatly reduced. They do not believe that the personnel radiation exposure necessary for the present 31 day inspection is justified under our as-low-as-reasonably-achievable concept.

We agree that it is not necessary to inspect the hose stations inside the containment every 31 days. We find that this inspection shall be required at the beginning of each cold shutdown, but no more often than once every 31 days. TS 4.7.11.4.a should be revised to reflect this finding.

B.3 Upgrading the Auxiliary Feedwater System

NUREG-0578 and other related NRC correspondence has required each licensee to modify the auxiliary feedwater system (AFWS) to provide automatic initiation of AFWS flow upon loss of main feedwater flow. This proposed change provides TS revisions that will be issued when our review is completed.

B.5 Deletion of Snubbers

BG&E proposes to delete fifteen snubbers from Table 3.7-4 for Unit No. 1, thereby reducing the surveillance requirements. However, further discussion with BG&E led to the belief that snubbers on the emergency Diesel Generator exhaust lines should not be removed from the surveillance list. Therefore, snubbers Nos. 1-24-1, 1-24-2, 1-24-3, 1-24-3A, 1-24-4, 1-24-4A, 1-24-5, 1-24-6, and 1-24-6A should remain in Table 3.7-4. Snubbers Nos. 1-69-1, 1-71-1, 1-71-2, 1-71-2A, 1-71-3, and 1-71-4 are snubbers supporting components of the waste processing system. We find that the above six snubbers provide support for non-safety related systems and therefore may be deleted from the TS listing of safety related snubbers in Table 3.7-4.

B.6, 7, and 8 Addition of Snubbers

These proposed changes would add Snubber 1-64-35 to TS Table 3.7-4 for Unit No. 1 and add 2-38-1, 2-38-2, 2-63-1, 2-63-2, 2-15-8, and 2-15-9 to the Unit No. 2 TS Table 3.7-4. BG&E states that these snubber listing additions are the result of physical support modifications (the Unit No. 1 change results from a support modification on the letdown piping) or reidentification of snubbers as supports on safety-related piping (the Unit No. 2 changes result from reclassification of RCS sample, steam generator blowdown and component cooling water piping).

We find the addition of the above snubbers to the CCNPP Unit Nos. 1 and 2 TS Table 3.7-4 and the resultant increase in inspection of these safety related snubbers to be acceptable.

Environmental Consideration

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of accidents previously considered and do not involve a significant decrease in a safety margin, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: September 10, 1980