

BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

December 31, 1980

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

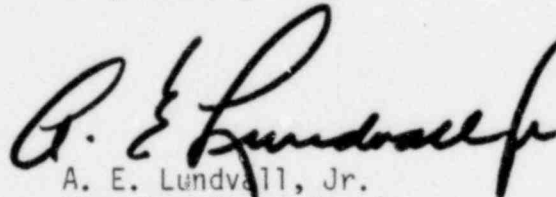
ATTENTION: Robert T. Carlson, Chief
Reactor Construction and Engineering
Support Branch

Gentlemen:

This refers to your Inspection Report 50-317/80-21, which transmitted one item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to that item in your letter of December 11, 1980.

Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,


A. E. Lundvall, Jr.
Vice President-Supply

AEL/RED/gla

Enclosure (1)

8102250 450

ENCLOSURE (1)

REPLY TO APPENDIX A OF IE
INSPECTION REPORT 50-317/80-21

While the spent fuel racks were not designed and fabricated in accordance with the ASME Boiler and Pressure Vessel Code Section III subsection NF, they were built to the American Institute of Steel Construction (AISC) Code. A safety analysis, performed in accordance with 10 CFR 50.59, determined that the change in criteria does not involve an unreviewed safety question. The NRC guidance to the utilities, titled "Review and Acceptance of Spent Fuel Storage and Handling Applications", states that the design and fabrication shall be based upon the AISC specification or Subsection NF. The AISC code provides structural integrity equal to subsection NF and, therefore, no unreviewed safety question exists.

To prevent further non-compliance, BG&E Specification SP-267 will be revised by January 1, 1981.

A revised licensing report describing the as-built design of the racks will be submitted to the NRC by February 1, 1981.