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Docket Nos. 50-317  
and 50-318

Mr. A. E. Lundvall, Jr.  
 Vice President - Supply  
 Baltimore Gas & Electric Company  
 P. O. Box 1475  
 Baltimore, Maryland 21203

Dear Mr. Lundvall:

We have completed our review of the Combustion Engineering (CE) Topical Report CEN-121(B)-P, "Methods of Analyzing Sequential Control Element Assembly Group Withdrawal Event for Analog Protected Systems", dated November 1979. Our evaluation of CEN-121(B)-P is enclosed.

Based on our review of CEN-121(B)-P, we conclude that the subject report is an acceptable reference for the method of analyzing a Control Element Assembly Group Withdrawal (CEAW) event for Calvert Cliffs Units 1 and 2. We concur that the results presented support reclassification of the CEAW event from the category requiring the Thermal Margin/Low Pressure (TM/LP) and Axial Shape Index (ASI) trips to the category where sufficient initial thermal margin is built into the Limiting Condition for Operation (LCO's) to ensure that Departure from Nucleate Boiling (DNB) and Linear Heat Rate 1 (LHR) Specified Acceptable Fuel Design Limits (SAFDL's) are not exceeded when only the High Power (HP) or Very High Power (VHP) trips are credited as possible trips to mitigate the event. This reclassification infers that the CEAW event is no longer the limiting event for the calculation of the pressure bias factor used in establishing the TM/LP setpoints although this bias term for the TM/LP trip is still required and determined for other transients as described in CENPD-199-P.

Sincerely,

Original signed by  
 Robert A. Clark  
 Robert A. Clark, Chief  
 Operating Reactors Branch #3  
 Division of Licensing

Enclosure: As stated

cc: See next page

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 PDR ADOCK 05000317  
 P PDR

OFFICE ▶	ORB#3:DL	ORB#3:DL	ORB#3:DL			
SURNAME ▶	PMKreutzer	DJaffe/m	RAClark			
DATE ▶	9/1/81	9/2/81	9/2/81			

Baltimore Gas and Electric Company

cc:

James A. Biddison, Jr.  
General Counsel  
Baltimore Gas and Electric Company  
P. O. Box 1475  
Baltimore, MD 21203

George F. Trowbridge, Esquire  
Shaw, Pittman, Potts and Trowbridge  
1800 M Street, N. W.  
Washington, D. C. 20036

Mr. R. C. L. Olson, Principal Engineer  
Nuclear Licensing Analysis Unit  
Baltimore Gas and Electric Company  
Room 922 - G&E Building  
P. O. Box 1475  
Baltimore, MD 21203

Mr. Leon B. Russell  
Plant Superintendent  
Calvert Cliffs Nuclear Power Plant  
Maryland Routes 2 & 4  
Lusby, MD 20657

Bechtel Power Corporation  
Attn: Mr. J. C. Judd  
Chief Nuclear Engineer  
15740 Shady Grove Road  
Gaithersburg, MD 20760

Combustion Engineering, Inc.  
Attn: Mr. P. W. Kruse, Manager  
Engineering Services  
P. O. Box 500  
Windsor, CT 06095

Public Document Room  
Calvert County Library  
Prince Frederick, MD 20678

Director, Department of State Planning  
301 West Preston Street  
Baltimore, MD 21201

Mr. R. M. Douglass, Manager  
Quality Assurance Department  
Fort Smallwood Road Complex  
P. O. Box 1475  
Baltimore, MD 21203

Mr. T. L. Syndor, General Supervisor  
Operations Quality Assurance  
Calvert Cliffs Nuclear Power Plant  
Maryland Routes 2 & 4  
Lusby, MD 20657

Ms. Mary Harrison, President  
Calvert County Board of County Commissioners  
Prince Frederick, MD 20768

U. S. Environmental Protection Agency  
Region III Office  
Attn: EIS Coordinator  
Curtis Building (Sixth Floor)  
Sixth and Walnut Streets  
Philadelphia, PA 19106

Mr. Ralph E. Architzel  
Resident Reactor Inspector  
NRC Inspection and Enforcement  
P. O. Box 437  
Lusby, MD 20657

Mr. Charles B. Brinkman  
Manager - Washington Nuclear Operations  
Combustion Engineering, Inc.  
4853 Cordell Avenue, Suite A-1  
Bethesda, MD 20014

Mr. J. A. Tierman, Manager  
Nuclear Power Department  
Calvert Cliffs Nuclear Power Plant  
Maryland Routes 2 & 4  
Lusby, MD 20657

Mr. W. J. Lippold, Supervisor  
Nuclear Fuel Management  
Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
P. O. Box 1475  
Baltimore, Maryland 21203

Mr. R. E. Denton, General Supervisor  
Training & Technical Services  
Calvert Cliffs Nuclear Power Plant  
Maryland Routes 2 & 4  
Lusby, MD 20657

Administrator, Power Plant Siting Program  
Energy and Coastal Zone Administration  
Department of Natural Resources  
Tawes State Office Building  
Annapolis, MD 21204