

BALTIMORE GAS AND ELECTRIC COMPANY

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VICE PRESIDENT
SUPPLY

December 21, 1981

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555



ATTENTION: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Request for Amendments

REFERENCES: a) NUREG-0737, "Post-TMI Requirements", dated
October 31, 1980
b) BG&E Letter dated July 21, 1981, from A. E. Lundvall, Jr.
to R. A. Clark

Gentlemen:

Baltimore Gas and Electric Company hereby requests an Amendment to its Operating Licenses Nos. DPR-53 and DPR-69 for Calvert Cliffs Units 1 & 2, respectively, with the submittal of the enclosed proposed changes to the Technical Specifications.

The proposed Amendment (Attachment 1) is being requested in accordance with Reference (a) and amends current Technical Specifications to include the automatic initiation of Auxiliary Feedwater to each Steam Generator for MODES 1 & 2 per item II.E.1.2 of reference (a).

Figure 3.7-1 of Attachment (1) is a new Figure generated by this proposed Amendment and represents limits imposed as a result of our undercooling and overcooling analysis upon automatic initiation of auxiliary feedwater.

The proposed Amendment (Attachment 2) is being requested in accordance with Reference (a) and revises current Technical Specifications to exclude the automatic initiation of Auxiliary Feedwater for MODE 3 per Item II.E.1.2

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of Reference (a). Attachment (2) has been separated from Attachment (1) to eliminate any confusion by the Plant Operating Staff with respect to applicability of automatic initiation of auxiliary feedwater during heat-up and cooldown modes of operation. Since such operations necessitate maneuvering AFW flow control valves, to facilitate maintenance of heat-up and cooldown limits on the reactor plant while maintaining adequate steam generator inventory, obviously the required settings of these valves per Attachment (1) are not applicable during such operations.

Attachment (3), designated Figure 3.7-(Later), is being submitted for your review. This curve is not to be considered a part of Attachment (1) at this time. Attachment (3) represents an example of a proposed curve correlating Steam Generator Pressure versus Auxiliary Feedwater Flow which will be submitted under a separate proposed Amendment to Technical Specification 3.7.1.2 at a later date. Attachment (3) will be empirically derived during the first available refueling outages for Units 1 & 2, currently scheduled for April 17, 1982, and January 1, 1983, respectively. This correlation will provide some flexibility in performing future surveillance testing in as far as flow verifications may be performed at steam generator pressures other than that specified by Figure 3.7-1 of Attachment (1) and referenced in the Technical Specification Bases of Attachment (1).

In reference (b) we committed to performing tests to verify Attachment (3) data by January 1, 1982. Surveillance requirements 4.7.1.2.c.3 and 4.7.1.2.d of the proposed Amendment (Attachment 1), along with the Attachment (3) data require a reduction in power for a period necessary to set flow control valves on each unit.

To implement the proposed amendment, we intend to reduce power on each unit the first available weekend following approval of the proposed amendment. However, to minimize the number of forced reductions in power required to meet subsequent surveillance testing, we request a date extension on observing surveillance requirements 4.7.1.2.c.3 and 4.7.1.2.d until the Attachment (3) data can be produced.

It is anticipated that the first available opportunity to perform the tests to produce Attachment (3) data will be during the scheduled refueling outages. We, therefore, request, concurrently with these amendments, a date extension of 30 days beyond the scheduled outage completion dates for Units 1 and 2 to submit the Attachment (3) data. For Units 1 and 2 we anticipate submittal completion dates of August 9, 1982, and May 9, 1983, respectively.

Since this proposed amendment has been prescribed in NUREG-0737, which addresses generic post-TMI concerns, we feel the following comments should be considered in your review. The undercooling and overcooling analyses which resulted in the Technical Specifications of Attachment (1) were done with the objective of determining a flow setpoint which would allow a reasonable time for operator action before either of the following conditions occur:

- (a) inadequate heat sink, due to insufficient AFW flow, or
- (b) safety injection actuation, due to excessive AFW flow.

The analyses were based on best estimate assumptions which provided realistic results. For example, plant systems were assumed to function normally, steam line or feed line breaks were not assumed to occur, uncertainties were based on reasonably conservative estimates as opposed to absolute theoretical worst case.

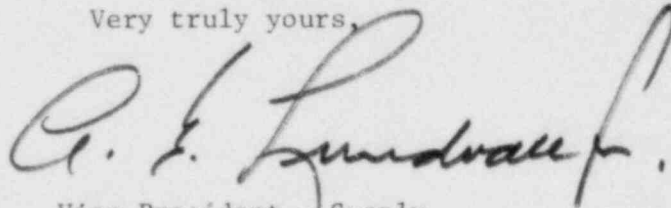
SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications have been reviewed by our Plant Operations and Safety Review and Off-Site Safety and Review Committees, and they have concluded that implementation of these changes will not result in an undue risk to the health and safety of the public.

FEE DETERMINATION

We have determined, pursuant to 10 CFR Part 170 Paragraph 170.22, that this Amendment request consists of Class III and Class I amendments for Calvert Cliffs Unit Nos. 1 and 2, respectively, and, accordingly, we are including BG&E Check No. A028356 in the amount of \$4,400.00 to cover the fee for this request.

Very truly yours,



Vice President - Supply

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