BALTIMORE GAS AND ELECTRIC COMPANY

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NUCLEAR POWER DEPARTMENT
CALVERT CLIFFS NUCLEAR POWER PLANT
LUSBY, MARYLAND 20657



April 13, 1982

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

ATTENTION: Mr. D. H. Jaffe
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Response to Proposed Leakage Evaluation

REFERENCE: a) NRC memorandum, R. Mattson to J. Sniezek dated January 11, 1981

Gentlemen:

In reference (a), Mr. R. Mattson proposes a new method of evaluating leakage information obtained during containment testing as required by 10 CFR 50, Appendix J. Baltimore Gas and Electric Company disagrees with this proposal.

Reference (a) states, if the Type A test is conducted after the completion of Type B and C tests, a correction factor must be applied to determine the "as-found" condition of the containment. This correction factor would account for repairs or adjustments made as a result of the Type B or C test.

Paragraph III.A.1.a of 10 CFR 50, Appendix J, is cited by reference (a) as the reason for imposing this correction factor to determine the "as-found" condition. Appendix J does not require the "as-found" condition as defined by reference (a). Paragraph III.A.1.a actually states, that no repair or adjustment shall be,"made during the period between the initiation of the containment inspection and the performance of the Type A test." Containment inspection is defined in paragraph V.A, Appendix J, as a general inspection of the accessible surfaces of containment, performed prior to any Type A test. Furthermore, the third sentence of paragraph III.A.1.a specifically allows repairs and adjustments to be made, ". . . between the completion of one Type A test and the initiation of the containment inspection for the subsequent Type A test," without imposing any correction factors.

Baltimore Gas and Electric Company is firmly committed to the correct performance of both the Type A test and the Type B and C tests. Our commitment is based on the purposes of these tests as stated in the introductory paragraph of Appendix J: a) assure



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that leakage from the containment does not exceed allowable leakage rate as specified in the technical specifications, and b) assure that periodic surveillance of reactor containment penetration and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment. However, we disagree with any attempt to correlate between the local leak rate test, LLRT (Type B & C), and the integrated leak rate, ILRT (Type A). Each test, LLRT and ILRT, provide useful but different information and any general correlation is useless because of different conditions which exist during the performance of these tests. For our units these differences are: a) valve line-ups are different and b) pressurization of the isolation valves are sometimes in different directions. Our current course of action constitutes an appropriate level of surveillance to ensure continued containment integrity. Any significant deviations from our present surveillance methodology will no doubt create unnecessary and meaningless additional expenditure of money, manpower, and outage time to support increased LLRT and ILRT surveillance.

With regard to the staff's concern for containment integrity, our program of testing and repair will continue to be as follows:

1. Determinaton of the "as-found" valve leakage rate with testing equipment currently on site.

2. Repair of those valves which may exceed maximum individual leak rate as established in our LLRT procedure.

3. Repair of those valves whose leak rate does not exceed a limit, but have been identified by plant management as needing repair.

4. Review and compare previous individual valve leakage rates and by good engineering practices, determine appropriate action for assurance that the containment integrity is being satisfactorily maintained. Appropriate actions may include:

   a. Valve replacement,
   b. Increased valve testing, and
   c. Modified valve line-ups to minimize containment leakage

5. Report to the NRC, Type A, B, and C test results and other information as stated in paragraph V.B.3, Appendix J, 10 CFR 50.

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

Sincerely yours,

For D. W. Latham
Principal Engineer -
Operational Licensing & Safety

cc: R. E. Denton
R. C. L. Olson
J. W. Doswell
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