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February 9, 1994

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
10 CFR 50.9 Notification Concerning Erroneous Information Supplied in a License Amendment Request

REFERENCES:
(a) Letter from R. E. Denton (BG&E) to Document Control Center (NRC), dated April 1, 1993, License Amendment Request; Onsite Power Distribution Systems, A.C. Distribution - Operating

(b) Letter from D. G. McDonald (NRC) to R. E. Denton (BG&E), dated October 29, 1993, Issuance of Amendments for Calvert Cliffs Nuclear Power Plant, Unit No. 1 and Unit No. 2

On February 3, 1994 we discovered an error in a License Amendment Request. This error was not identified until after the Nuclear Regulatory Commission (NRC) issued a corresponding License Amendment and Safety Evaluation Report (SER). Since this information was used by the NRC during the technical review process in approving the License Amendment, we have chosen to report this information under the requirements of 10 CFR 50.9(b). We verbally notified our NRC Project Manager and Resident Inspectors office of the error. Feedback from our Regional Office indicated that a formal verbal notification to the Regional Administrator was not warranted under 10 CFR 50.9 and submission of Attachment (1) was requested.

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

Very truly yours,

RED/CDS/cds/bjd

Attachment

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cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
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ATTACHMENT (1)

10 CFR 50.9 NOTIFICATION CONCERNING ERRONEOUS INFORMATION SUPPLIED IN A LICENSE AMENDMENT REQUEST

We have discovered that an erroneous statement exists in a License Amendment Request and that error was reflected in the corresponding License Amendment and Safety Evaluation Report (SER) issued by the Nuclear Regulatory Commission (NRC). These documents indicate that our inverter backup bus is fed from a Class 1E transformer. In fact, the inverter backup bus receives power from a Class 1E source, but the transformer itself is not a Class 1E component nor does it supply Class 1E power to other components.

In a License Amendment Request dated April 1, 1993, Baltimore Gas and Electric Company requested a change to Technical Specification 3.8.2.1, "Onsite Power Distribution Systems, A.C. Distribution - Operating." The License Amendment Request proposed extending the allowed outage time during Modes 1, 2, 3, and 4 with one 120 VAC vital bus powered by an inverter backup bus from 8 to 24 hours. The request states, "The inverter backup bus is fed from a Class 1E 480/120 VAC regulated transformer (diesel backed). Therefore, the inverter backup bus is an interruptible source that is de-energized in a loss of offsite power (LOOP) and re-energized when the emergency diesel generator is connected to the 4 kv bus. Because the design of the 120 volt vital AC system is to provide continuous power to instrument and control circuits, the interruptible inverter backup bus is considered a backup power source, not an emergency power source, to the 120 Volt Vital AC system." The submittal goes on to state that, "By using the backup bus, the RPS and ESFAS channel powered by the vital bus is able to perform its function for all analyzed design basis accidents except those involving a concurrent LOOP."

The requested change was approved by the NRC Staff on October 29, 1993. The associated NRC SER states, "Although the inverter backup bus is fed from a Class 1E regulated transformer that, in turn, is backed by an emergency diesel generator, it is not capable of providing uninterruptible power to the vital busses during design basis events such as a loss of off-site power. Therefore it is not considered an emergency source of power. Currently when the backup bus is used, the vital bus it is powering is declared inoperable and an 8-hour action statement is entered."

A Design Engineer reviewing the SER noted the erroneous statement and notified Licensing of the discrepancy. Licensing reviewed the discrepancy and determined the erroneous information could have been relied on by the NRC in reviewing the proposed change. Upon reaching this conclusion Licensing contacted the NRC Project Manager and prepared an Issue Report to ensure the issue is addressed by our corrective action process.

We understand the need and requirement that all information provided to the NRC be accurate. We intend to provide a full and accurate description of the inverter backup bus and any additional information needed to permit a review of the Staff's conclusions in this matter. In the interim, we have administratively prohibited the use of the 24-hour action requirement until we receive the results of this review.

We have utilized the 24-hour action statement only once since its approval. We were in the action statement for a 24-hour period between January 24 and 25, 1994. The plant was in Mode 3 for the full 24-hour period. The maximum allowed outage time on the backup bus will be limited to the pre-amendment limit of eight hours.

We have initiated actions to address the generic implications of this event. A root cause analysis is underway to identify why the inaccurate information was not detected during our review and approval of the License Amendment Request. We will inform you of the results of this investigation and the corrective and preventative measures we intend to take.