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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

September 29, 1982

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

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

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 1 and Unit No. 2
Docket Nos. 50-317 and 50-318
Request for Amendment to
Pressurizer Level LCO Technical Specifications

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an amendment to operating licenses DPR 53 and DPR 69 for Calvert Cliffs Units 1 and 2. We propose to modify Technical Specification 3.4.4, Pressurizer Limiting Condition for Operation, and its associated Surveillance Requirements.

BACKGROUND

Operating experience has demonstrated that the present LCO on pressurizer level is too restrictive resulting in an excessive number of Licensee Event Reports (LERs).

TECHNICAL SPECIFICATION CHANGE

The limits of acceptable pressurizer level have been redefined and thereby provide a broader operating band. This new operating band should significantly reduce the number of violations of the pressurizer LCO. Attachment I to this letter contains proposed modifications to Technical Specification Pages 3/4 4-5 and B 3/4 4-2. The limits of the operating band include allowances for instrument loop uncertainty and drift.

SAFETY ANALYSIS

Attachment II to this letter is a description of the reevaluation of certain events whose consequences are sensitive to the value of pressurizer level when an event initiates. Specifically, the Loss of Load Event and excessive charging events

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were analyzed to determine the maximum acceptable pressurizer level. The Excess Load Event was reanalyzed to determine the minimum acceptable level. The Steam Generator Tube Rupture Event was also reanalyzed to determine the effect of the higher primary to secondary leak rate on site boundary doses. The higher leak rate results from a higher initial pressurizer liquid volume in this analysis which in turn yields a slower decrease in pressurizer pressure during the event.

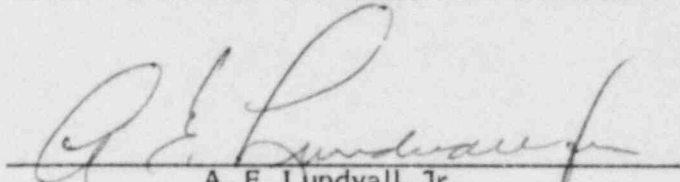
The Plant Operations and Safety Review Committee (POSRC) and the Offsite Safety Review Committee (OSSRC) have reviewed Attachments I and II. They conclude that the proposed modification constitutes an unreviewed safety question since several of the reanalyzed events result in consequences slightly more adverse than previously reported. Specifically, the Loss of Load Event results in a peak pressurizer pressure of 2617 psia; 67 psia above that from the previous analysis. However, peak pressure is still less than the design limit of 2750 psia. In addition, the assumptions for reanalysis of the Excess Load Event were selected to yield the maximum voiding in the reactor vessel upper head. However, the degree of voiding is insufficient to impair primary coolant circulation. And finally, the reanalysis of the Steam Generator Tube Rupture Event results in site boundary doses slightly higher than previously reported but still considerably below the guidelines of 10 CFR 100. Therefore, the Safety Committees conclude that the proposed modification does not present an undue risk to the health and safety of the public.

FEE DETERMINATION

We have determined, pursuant to 10 CFR 170, Paragraph 170.22, that this request constitutes a Class I and Class III amendment for the Calvert Cliffs Units. Baltimore Gas and Electric Company's check No. A011853, in the amount of \$4,400.00, is included to cover the fee for this request.

Very truly yours,

BALTIMORE GAS AND ELECTRIC COMPANY



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

AEL/WJL./fid

Attachments

STATE OF MARYLAND, CITY OF BALTIMORE, TO WIT:

Arthur E. Lundvall, Jr., being duly sworn states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he executed the foregoing Amendment for the purposes therein set forth; that the statements made in said Amendment are true and correct to the best of his knowledge, information, and belief; and that he was authorized to execute the Amendment on behalf of said Corporation.

WITNESS My Hand and Notarial Seal this *first* day of *October* 1982.

Ruth H. Greese

Notary Public

My Commission Expires:

July 1, 1986

Copies To: J. A. Biddison, Esquire (w/ Attach)
G. F. Trowbridge, Esquire (w/ Attach)
D. H. Jaffe - NRC
P. W. Kruse - CE
R. E. Architzel - NRC