



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20565-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 187 TO FACILITY OPERATING LICENSE NO. DPR-53
AND AMENDMENT NO. 164 TO FACILITY OPERATING LICENSE NO. DPR-69
BALTIMORE GAS AND ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-317 AND 50-318

1.0 INTRODUCTION

By letter dated August 27, 1993, as supplemented March 11, 1994, the Baltimore Gas and Electric Company (the licensee) submitted a request for changes to the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, Technical Specifications (TSs). The requested changes would revise the TSs for Units 1 and 2 by removing the list of containment isolation valves (CIVs) in Table 3.6-1, "Containment Isolation Valves." Accompanying changes would also be made to TSs 1.8.1.b, 3.6.1.1, 4.6.1.1.a, 3.6.4.1, 4.6.4.1.1, 4.6.4.1.2, 4.6.4.1.3, 4.9.9, and to the TS Bases. The requested changes are a "line-item" TS improvement and follow the guidance of Generic Letter (GL) 91-08, "Removal of Component Lists From Technical Specifications." GL 91-08 indicated that an acceptable alternative to identifying every CIV by its plant identification number in the TSs is to incorporate the list of valves into plant procedures that are subject to the control provisions in the Administrative Controls Section of the TSs. Any change to the list contained in plant procedures would be subject to the requirements specified in the Administrative Controls Section of the TSs. The March 11, 1994, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The licensee has proposed that the list of CIVs in Table 3.6-1 be removed from the TSs. With the removal of Table 3.6-1, the provisions of certain associated Table Notations must be relocated to other TSs and references to the table must be deleted, as discussed below.

Table Notation * for Table 3.6-1 currently allows CIVs that are normally closed to be open on an intermittent basis under administrative control. The licensee has proposed that this provision be retained through the addition of a footnote to TS 3.6.4.1 that would read as follows:

"Valves that are normally closed may be opened on an intermittent basis under administrative control."

The licensee has also proposed that TSs 1.8.1.b. and 4.6.1.1.a. be revised to reflect the relocation of the provision to intermittently open normally closed valves to TS 3.6.4.1.

In GL 91-08, the NRC staff restated its position on considerations that constitute an acceptable administrative control for opening normally closed CIVs. The staff recommended that these considerations be stated in the TS Bases as the following:

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with the control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

The staff noted that the licensee did not propose to add a statement of these considerations to the TS Bases. However, as stated in the licensee's letter dated March 11, 1994, the licensee intends to employ administrative controls for opening normally closed CIVs which include considerations that are consistent with the staff's position in GL 91-08. Specifically, the licensee stated that evaluations pursuant to 10 CFR 50.59 to support opening these valves would include consideration of actions needed to place the valve in its post-accident condition. This could include actions such as the need to station an operator, who is in constant communication with the control room, at the valve controls; instructing this operator to close the valve in an accident situation; or evaluating the environmental conditions to assure that an operator would have access to close the valve and that this action will prevent the release of radioactivity outside the containment. The licensee also stated that plant procedures would be revised to include any administrative controls deemed necessary to allow safe opening of these valves. The staff finds these licensee commitments to be acceptable.

Table Notation ** for Table 3.6-1 currently specifies that isolation times for containment purge isolation valves only apply in MODE 6 when the valves are required to be OPERABLE and they are open. The notation further specifies that isolation time for containment purge isolation valves is NA for MODES 1, 2, 3, and 4 per TS 3/4 6.1.7, during which time these valves must remain closed. The licensee has proposed that the provisions of this notation be retained through the addition of a footnote to TSs 3.6.4.1 and 4.6.4.1.1 that would read the same as Table Notation **.

Table Notations (1) and (3) for Table 3.6-1 are informational. The licensee has, therefore, not proposed to retain the information in these notations in the TSs.

Table Notation (2) for Table 3.6-1 currently allows shutdown cooling isolation valves to be opened below 300 °F to establish shutdown cooling flow. The

licensee has proposed that the provisions of this notation be retained through the addition of a footnote to TS 3.6.1.1 that would read as follows:

"The shutdown cooling isolation valves may be opened when the RCS temperature is below 300 °F to establish shutdown cooling flow."

Table Notation (4) for Table 3.6-1 currently specifies that containment vent isolation valves shall be opened for containment pressure control, airborne radioactivity control, and surveillance testing purposes only. The licensee has proposed that the provisions of this notation be retained through the addition of a footnote to TSs 3.6.1.1 and 4.6.1.1.a. that would read as follows:

"Hydrogen purge containment vent isolation valves shall be opened for containment pressure control, airborne radioactivity control, and surveillance testing purposes only."

Since the requested changes would remove the list of CIVs in Table 3.6-1, the licensee has proposed that the current references to CIVS "specified in Table 3.6-1" in TSs 3.6.4.1, 4.6.4.1.1, and 4.6.4.1.2 be deleted.

Where applicable, Table 3.6-1 specifies maximum allowable closure times for CIVs. These limits would no longer be in the TSs with the deletion of the Table 3.6-1. However, as noted in GL 91-08, the inservice testing requirements referenced in TS 4.0.5 include the verification of valve-stroke times for a broader class of valves than those CIVs currently listed in the TSs. The removal of the valve closure times that are specified in Table 3.6-1 would not alter the TS requirements to verify that valve-stroke times are within their limits.

In order to accommodate removal of the CIV closure (or isolation) times from the TSs, the licensee has proposed the deletion of references in TSs 3.6.4.1 and 4.6.4.1.3 to CIV isolation times shown in Table 3.6-1. The licensee has also proposed that surveillance requirements for the containment purge valve isolation system in TS 4.9.9 be modified to explicitly state that the isolation times for these valves are to be within limits when tested pursuant to TS 4.0.5. Similarly, the licensee has proposed that the Bases for TS 3/4.6.4 be modified to indicate that the isolation time limits for CIVs are specified in plant procedures.

The NRC staff has reviewed the proposed TS changes and finds them acceptable, because they are consistent with the guidance in GL 91-08. In addition, the NRC staff has no objections to the proposed changes to the TS Bases.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Maryland State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (58 FR 50966). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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