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GEORGE C CREEL VICE PRESIDENT NUCLEAR ENERGY (301) 260-4455

December 17, 1990

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

Follow-up Response to Generic Letter 89-19, Unresolved Safety Issue A-47

REFERENCES:

- (a) Generic Letter 89-19, Request for Action Related to Unresolved Safety Issue A-47, "Safety Implications of Control Systems in LWR Nuclear Power Plants" Pursuant to 10 CFR 50.54(f)
- (b) Letter from Mr. G. C. Creel (BG&E) to NRC Document Control Desk, dated March 19, 1990, Response to Generic Letter 89-19, Unresolved Safety Issue A-47

Gentlemen:

In our initial response to Generic Letter 89-19, we stated that our Emergency Operating Procedures (EOPs) would be reassessed to ensure that operators can handle the spectrum of possible small break loss-of-coolant-accidents. The assessment is complete. The final report from Combustion Engineering Owners Group showed that Loss of Coolant Emergency Operating Procedure (EOP-5) is adequate and no changes were required. The report did, however, recommend several enhancements to the procedure:

- Enhancements to the Safety Function Status Check (SFSC)
 - Include use of the Reactor Vessel Level Monitoring System to verify other indications that the core is covered.
 - Include notes to explain that during Reactor Coolant S, stem two-phase natural circulation flow, the requirement for 10°F to 50°F (T-hot minus T-cold) is not indicative of core flow.

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- Include notes to explain that the upper limit of 900 psia for Steam Generator (S/G)
 Pressure Control does not consider that the S/G may be steaming through safety vaives at pressures greater than 1000 psia.
- Include isolation of unneeded primary systems as a separate step and accomplished as a primary action.
- Include a graph which indicates the amount of make-up water needed (based on the decay heat rate and expected time to initiate shutdown cooling).

These enhancements are being evaluated and will be incorporated in the EOPs, as appropriate, as part of our ongoing Procedure Upgrade Program.

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

Very truly yours,

GCC/JMO/dlm

cc: D. A. Brune, Esquire

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