

BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475
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October 29, 1982

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

U.S. Nuclear Regulatory Commission
Division of Licensing
Room 430 Phillips Building
Washington, DC 20555

ATTENTION: Mr. David H. Jaffe, Project Manager
Operating Reactors Branch #3

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Inservice Inspection Program

- REFERENCES: (1) BG&E Letter from A. E. Lundvall, Jr., to R. A. Clark, dated November 6, 1981, Inservice Inspection Program Request for Relief from ASME Code Section XI
- (2) BG&E Letter from A. E. Lundvall, Jr., to R. W. Reid, dated March 29, 1980, Inservice Inspection Program Request for Relief from ASME Code Section XI

Gentlemen:

The letters referenced requested relief from ASME Code Section XI requirements as provided by the provisions of 10 CFR 50.55a(g)(5). Included in these requests were exemptions from performing system hydrostatic pressure tests on Class III portions of Component Cooling, Service Water, and Saltwater Cooling Systems at Calvert Cliffs Unit Nos. 1 and 2. On the main headers of these systems, where butterfly valves are installed, sufficient seal to maintain hydrostatic pressure on isolated portions cannot be achieved. In lieu of performing hydrostatic pressure tests once every ten (10) years, it was proposed to perform system pressure tests at an increased (annual) frequency.

Presently, Calvert Cliffs is following ASME Code Section XI, 1974 Edition, with Addenda through Summer 1975. This requires that Class III hydrostatic pressure tests be performed at 1.10 times the system design pressure. During your review of the referenced exemption requests, it was pointed out that later approved addenda of ASME Code Section XI may reduce hydrostatic pressure requirements to an achievable pressure for these Class III systems. ASME Code Section XI, 1977 Edition, with Addenda through Summer 1978, requires that Class III hydrostatic pressure tests be performed at 1.10 times the lowest relief valve setting for the system. For Component Cooling, Service Water, and Saltwater Cooling Systems the lowest relief valve settings are equal to or very close to the system design pressure. Therefore, optionally updating to the later approved addenda of ASME Code Section XI will not alter the impracticality of performing hydrostatic pressure tests on these systems. The following is a list of these pressures.

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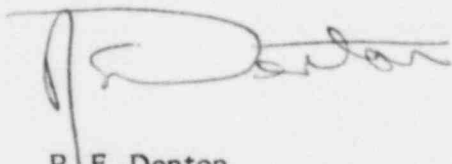
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	<u>SERVICE WATER</u>	<u>COMPONENT COOLING</u>	<u>SALT WATER</u>
Design Pressure (psig)	150	150	60
Lowest Relief Setting (psig)	150	110	50
Normal Operating Pressure (psig)	100-120	60-80	20-35
74-S75 Hydro Pressure (psig)	165	165	66
77-S78 Hydro Pressure (psig)	165	121	55

It is requested that you continue with the approval process of these relief requests as originally stated in the referenced letters. Should you have further questions on this matter, please do not hesitate to contact us.

Very truly yours,



R. E. Denton
General Supervisor -
Training & Technical Services

RED/gla

cc: Messrs. L. B. Russell
R. P. Heibel
R. E. Architzel
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