

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 184 TO FACILITY OPERATING LICENSE NO. DPR-53 AND AMENDMENT NO. 161 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 November 11, 1993, 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 modify the requirement of Specifications 3.3.1.1 and 3.3.2.1. The proposed changes relocate Tables 3.3-2 and 3.3-5 which provide the response time limits for the reactor trip system (RTS) and the engineered safety features actuation system (ESFAS) instruments, from the TSs to the Updated Final Safety Analysis Report (UFSAR). The next revision to the UFSAR will include these tables. The NRC provided guidance on the proposed TS changes in Generic Letter (GL) 93-08, "Relocation of Technical Specification Tables on Instrument Response Time Limits," dated December 29, 1993, to all holders of operating licenses or construction permits for nuclear power reactors.

2.0 EVALUATION

Tables 3.3-2 and 3.3-5 contain the values of the response time limits for the RTS and ESFAS instruments. The limiting conditions for operation for RTS and ESFAS instrumentation require that these systems shall be operable with response times as specified in these tables. These limits are the acceptance criteria for the response time tests for each RTS and ESFAS trip function that is performed to satisfy the surveillance requirements of TSs 4.3.1.1.3 and 4.3.2.1.3. These surveillances ensure that the response times of the RTS and ESFAS instruments are consistent with the assumptions of the safety analyses performed for design basis accidents and transients.

Currently, the license amendment process is the only way that TSs changes for the RTS and ESFAS response time limits may be implemented. In contrast, the licensee may make changes to other conditions assumed in the safety analysis, as described in the UFSAR, under the provisions of Section 50.59 of Title 10 of the Code of Federal Regulations (10 CFR 50.59). The licensee may make changes to the UFSAR without NRC approval when the changes do not result in an unreviewed safety question. The staff has concluded that the provisions of

9402250240 940210 PDR ADOCK 05000317 PDR 10 CFR 50.59 provide an acceptable means to control changes to response time limits in lieu of a license amendment and that this can be accomplished by relocating the tables of RTS and ESFAS response time limits from the TSs to the UFSAR. This is a change only in administrative requirements because it does not alter the TSs requirements to perform response time tests or to ensure that the response times of the RTS and ESFAS instruments are within their limits.

The licensee has proposed changes to Specifications 3.3.1.1 and 3.3.2.1 by removing the references to Table 3.3-2 and 3.3-5 and by removing these tables from the TSs. The licensee has proposed to relocate the tables on response time limits to the UFSAR by including them in the next periodic update to the UFSAR. These actions are consistent with the guidance provided in GL 93-08. The staff has reviewed this matter and finds that the proposed changes to the TSs for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2, are acceptable.

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 on such finding (58 FR 67841). 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.

Principal Contributors: T. Dunning, D. McDonald

Date: February 10, 1994

February 10, 1994

Docket Nos. 50-317 and 50-318

Mr. Robert E. Denton Vice President - Nuclear Energy Baltimore Gas and Electric Company Calvert Cliffs Nuclear Power Plant 1650 Calvert Cliffs Parkway Lusby, Maryland 20657-4702

Dear Mr. Denton:

SUBJECT: ISSUANCE OF AMENDMENTS FOR CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 1 (TAC NO. M88321) AND UNIT NO. 2 (TAC NO. M88322)

The Commission has issued the enclosed Amendment No.184 to Facility Operating License No. DPR-53 and Amendment No.161 to Facility Operating License No. DPR-69 for the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application transmitted by letter dated November 11, 1993.

The amendments revise the TSs for both Units 1 and 2 by relocating the tables of response time limits for the Reactor Protection System and the Engineered Safety Features Actuation System instruments from the TSs to the Updated Final Safety Analysis Report. These amendments are a "line-item" TS improvement and follow the guidance of Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits."

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly <u>Federal Register</u> notice.

Sincerely, Original signed by: Daniel G. McDonald, Senior Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 184 to DPR-53

2. Amendment No. 161 to DPR-69

3. Safety Evaluation

cc w/enclosures:

See next page

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