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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

December 17, 1982

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

ATTENTION: Mr. D. G. Eisenhut, Director

Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant

Unit Nos. 1 and 2, Docket Nos. 50-317 and 50-318

NUREG 0737

REFERENCE: (a) Letter from D. G. Eisenhut to All PWR Licensees dated

September 20, 1982 (Generic Letter 82-16)

#### Gentlemen:

Reference (a) requested that we review the Calvert Cliffs Technical Specifications related to TMI Action Plan Items. The review was to include a comparison of existing Specifications and the model NUREG 0737 Technical Specifications provided as an enclosure to reference (a).

We have conducted the requested review with the following results. One Technical Specification was absent, two Technical Specifications related to a modification not yet implemented at our facility, and one Technical Specification deviated from Enclosure (1) to reference (a). These identified differences are Items 2, 3, 4 and 12, respectively, in Enclosure (1) of reference (a).

A proposed Technical Specification change is being processed to incorporate the requirements for Item 2, Limiting Overtime, into the Technical Specifications.

In addition, a proposed Technical Specification change will be submitted coincident with the completion of the installation of the third train AFW system, to meet the requirements of Items 3 and 4. We understand that our Technical Specifications currently comply with the requirements of NUREG-0737, Item II.K.3.3, Reporting SRV/SV Failures and Challenges, as promulgated by the Confirmatory Order dated July 10, 1981. Further information on these items is provided in the enclosure to this letter.

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Should you wish to discuss these matters further, please feel free to contact us.

Very truly yours,

Vice President-Supply

AEL/LES/sjb

cc: J. A. Biddison, Esquire

G. F. Trowbridge, Esquire D. H. Jaffe, NRC R. E. Architzel, NRC

#### **ENCLOSURE (1)**

## (2) Limit Overtime (I.A.1.3)

As noted in NRC I&E Inspection Report No. 50-317/82-16; 50-318/82-14 our administrative procedures have been revised to incorporate the guidelines of NRC Generic Letter 82-12 on Limiting Overtime. The Baltimore Gas and Electric Company is processing a proposed Technical Specification change to revise the administrative section of the Technical Specifications to incorporate the requirements of Generic Letter 82-12.

## (3) Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)

As stated in our submittal dated December 31, 1981, from A. E. Lundvall, Jr., to D. G. Eisenhut, our Auxiliary Feedwater System Modifications are still scheduled to be completed during the Unit 1 refueling outage beginning in Fall of 1983.

The modifications necessary to make the Unit 2 AFW third train operable are expected to be completed by the end of the current refueling outage. Those necessary to provide the cross connect tie between the discharge of Unit 1 and 2 motor driven AFW pumps will be completed to coincide with the Unit 1 AFW modification.

Changes to the Technical Specifications incorporating the modifications for Unit 2 are being processed and should be submitted shortly. The Technical Specification change required for Unit 1 will be processed to coincide with the completion of the Unit 1 AFW system modifications and testing.

# (4) Safety Grade AFW System Initiation and Flow Indication (II.E.1.2)

The requirements for safety grade initiation and flow indication have been completed for the existing Auxiliary Feedwater System, as described in our December 15, 1980, letter from A. E. Lundvall, Jr., to D. G. Eisenhut. As referenced in the same letter, the modifications which will incorporate the third train AFW system are scheduled for completion during the Unit 1 refueling outage beginning in Fall of 1983. As a part of these modifications, safety grade initiation and flow indication is being provided for the third train AFW system.

# (12) Reporting SV and SRV Failures and Challenges (II.K.3.3)

Discussions between our staff and yours concerning this issue during January 1981, led to revision of our Technical Specifications to require annual reporting of challenges or failures of pressurizer safety valves or PORV's. It was our understanding, that the requirements of NUREG-0737 Item II.K.3.3. have been met. This requirement was originally documented in a Confirmatory Order from R. A. Clark to A. E. Lundvall, Jr., dated July 10, 1981. The attachment to that Order, page 3, listed the Specific Requirement of Item II.K.3.3 as "Submit report (historical and annually thereafter) of SRV/SV failures and challenges". The requirements for annual reporting of failures and challenges were incorporated by License Amendments 68 and 50, dated March 9, 1982, for operating licenses DPR-53 and 69, respectively.