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June 8, 1994

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
License Amendment Request; Extension of Containment Air Cooler
Surveillances from 18 to 24 Months

REFERENCE: (a) NRC Generic Letter 91-04, Changes in Technical Specification
Surveillance Intervals to Accommodate a 24-Month Fuel Cycle, dated
April 2, 1991

Pursuant to 10 CFR 50.90, the Baltimore Gas and Electric Company hereby requests an Amendment to Operating Licenses Nos. DPR-53 and DPR-69 by the incorporation of the changes described below to the Technical Specifications for Calvert Cliffs Unit Nos. 1 and 2.

DESCRIPTION

The proposed amendment would revise the Calvert Cliffs Nuclear Power Plant Units 1 and 2 Technical Specification 4.6.2.2.b to extend the surveillance interval from 18 to 24 months. This surveillance verifies that for each containment air recirculation and cooling unit valves open and the fan starts automatically in slow speed on receipt of the appropriate Engineered Safety Features Actuation Signal (ESFAS) test signal. Calvert Cliffs has been operating on a 24-month fuel cycle since July 1987 (Unit 2), and July 1988 (Unit 1), performing some Technical Specification surveillances, such as those described here, during mid-cycle outages. This request is one of a series of proposed license amendments that would eliminate the need for mid-cycle surveillance outages by extending 18-month frequency surveillances to refueling interval (nominally 24 months).

BACKGROUND

The purpose of the Containment Air Cooling (CAC) System is to cool the containment atmosphere, and thereby limit containment pressure, following postulated accident conditions such as a Loss of Coolant Accident (LOCA) or a Main Steam Line Break (MSLB) in containment. The CAC System is also used to maintain containment temperature during normal operation.

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The CAC System consists of four cooling units inside containment which circulate service water through air cooling coils. The service water return line for each cooler has one manual and two air-operated stop valves, all in parallel. The air-operated valves can be controlled from the Control Room. One control valve is used for normal cooling requirements and the other control valve opens automatically on receipt of a Containment Spray Actuation Signal (CSAS). Air is drawn through the coils by a vaneaxial fan with a direct-coupled, two-speed motor. After a LOCA or MSLB, the fans are run in slow speed. All fan motors may be manually started or stopped from the Control Room. All four fan motors start automatically in, or switch to, slow speed on receipt of a Safety Injection Actuation Signal (SIAS). The subject surveillance demonstrates that CAC system fans and valves operate properly on receipt of a SIAS and CSAS.

The monthly and 18-month surveillances performed on the CACs are similar in that both insert a SIAS to start the CAC fans in slow speed or switch them from fast to slow speed and insert a CSAS to operate CAC valves.

REQUESTED CHANGE

Revise Technical Specification 4.6.2.2.b as shown on the marked-up pages attached to this transmittal, changing the surveillance interval from 18 month to refueling interval (nominally 24 months).

SAFETY ANALYSIS

The safety function of the CAC System is to limit containment pressure by cooling containment atmosphere in the event of a LOCA or MSLB. Reference (a) states that for cases where 18 month surveillances do not involve calibration of instruments that perform safety functions, licensees should evaluate the effect on safety of the change in surveillance intervals which supports a conclusion that the effect on safety is small. Licensees should confirm that historical maintenance and surveillance data do not invalidate this conclusion. An evaluation of the CAC surveillances from 1983-1994 found no surveillance test failures associated with these functions. The 18-month surveillance is similar to the monthly surveillance in that both test system response to a SIAS and CSAS. The 18-month surveillance differs only in that the SIAS and CSAS to the plant equipment are not blocked.

Problems with the CAC System that may occur during normal operation would be detected by operators using plant parameters monitored in the Control Room, such as containment temperature and CAC motor amps. No instruments are calibrated by this surveillance.

Based on the surveillance history, monthly surveillances, and Control Room indications provided, we conclude that the requested surveillance extension will not adversely affect our ability to detect degradation in the CAC System and does not invalidate any assumption in the plant licensing basis.

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendments:

1. *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The purpose of the Containment Air Cooling (CAC) System is to cool the containment atmosphere, and thereby limit containment pressure and temperature, following a Loss of Coolant Accident (LOCA) or Main Steam Line Break in containment. Failure of the CAC System is not an initiator for any previously analyzed accident. Therefore, the proposed change does not involve an increase in the probability of an accident previously evaluated.

Historical CAC System reliability, monthly surveillances and monitoring of CAC-related plant parameters provide assurance that undetected system degradation will not occur between 24-month surveillances, and the system will continue to perform its safety function. Therefore, there will be no significant increase in the consequences of accidents previously evaluated. Therefore, the proposed Technical Specification change does not increase the probability or consequences of an accident previously evaluated.

2. *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

This requested revision to increase the interval for a CAC surveillance from 18 to 24 months does not involve a significant change in the design or operation of the plant. No hardware is being added to the plant as part of the proposed change. The proposed change will not introduce any new accident initiators. Therefore, the proposed change would not create the possibility of a new or different type of accident from any accident previously evaluated.

3. *Does operation of the facility in accordance with the proposed amendment involve a significant reduction in a margin of safety.*

The CAC System provides a margin of safety by providing a means by which containment pressure can be limited following a LOCA or Main Steam Line Break. The proposed change does not affect the operation or design of the CAC System. Historical monthly surveillances and Control Room indications give assurance that the reduction in surveillance frequency will not adversely affect our ability to detect degradation in the system. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

ENVIRONMENTAL ASSESSMENT

The proposed amendment would change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20, or changes to an inspection or surveillance requirement. We have determined that the proposed amendment involves no significant hazards consideration, and that operation with the proposed amendment would result in no significant change in the types or significant increases in the amounts of any effluents that may be released offsite, and in no significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed amendment.

SCHEDULE

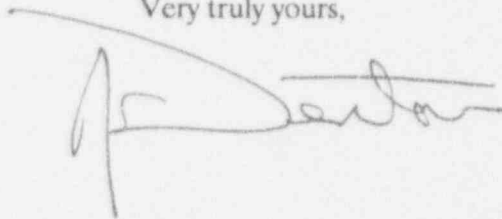
This change is requested to be approved and issued by December 1, 1994. However, issuance of this amendment is not currently identified as having an impact on outage completion or continued plant operation.

SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications and our determination of significant hazards have been reviewed by our Plant Operations and Safety Review Committee and Offsite Safety Review Committee. They have concluded that implementation of these changes will not result in an undue risk to the health and safety of the public.

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

Very truly yours,



STATE OF MARYLAND :
: TO WIT :
COUNTY OF CALVERT :

I hereby certify that on the 8th day of June, 1994, before me, the subscriber, a Notary Public of the State of Maryland in and for _____, personally appeared Robert E. Denton, being duly sworn, and states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements made are true and correct to the best of his knowledge, information, and belief; and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:

Donna L. McCready
Notary Public

My Commission Expires:

January 1, 1998
Date

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- Attachments: (1) Unit 1 Marked-Up Technical Specification Page
- (2) Unit 2 Marked-Up Technical Specification Page

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June 8, 1994

Page 5

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
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T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC

ATTACHMENT (1)

UNIT 1
TECHNICAL SPECIFICATION
MARKED-UP PAGE

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