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VICE PRESIDENT
NUCLEAR ENERGY
13011 280-4455

March 28, 1991

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
Request for Amendment

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 and 2, respectively, with the submittal of these proposed changes.

DESCRIPTION

The proposed amendments will make editorial changes and administrative corrections to the Licenses and Technical Specifications for both Unit 1 and Unit 2.

BACKGROUND

The original Technical Specifications for Calvert Cliffs Units 1 and 2 had many pages which were identical in content and annotated with both unit numbers. As changes have been made to the Technical Specifications, the annotations remain on pages which are not identical anymore. Many pages throughout the Technical Specifications are also double-sided. This situation has contributed to copying and amendment numbering problems. This amendment request is submitted in an effort to eliminate the administrative problems that both of these situations have created and to make several editorial changes. In addition, several administrative corrections have been identified which are included. Both the editorial changes and the administrative corrections are detailed in subsequent sections.

REQUESTED CHANGES

This amendment will make the following editorial changes throughout the Licenses and Technical Specifications for Units 1 and 2:

- ♦ Make all pages Unit specific

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- ◆ Make all pages single-sided
- ◆ Remove all intentionally blank pages
- ◆ Renumber pages which are alpha-numeric
- ◆ Place Defined Terms (Section 1.0) in alphabetical order
- ◆ Capitalize the first letter of system names
- ◆ Change the Index to the Table of Contents
- ◆ Place numbers by the LCOs so they are consistent with the Table of Contents
- ◆ Renumber the Figures and Tables so they are in numerical order and change references accordingly
- ◆ Correct obvious typographical errors
- ◆ Remove outdated footnotes

In addition to the editorial changes, this amendment will make several corrections involving discrepancies in both sets of Technical Specifications. These were determined to be administrative in nature after being researched to ensure that they do not constitute a substantive change to the Technical Specifications. The requested corrections are briefly described below with the detailed justification discussed in the following section:

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|----|----------------------------------|--|
| 1. | Table 2.2-1 (Units 1 & 2) | Correct the typographical error which changed the units for the Thermal Margin/Low Pressure Allowable Value Limit from "psia" to "psig". |
| 2. | Bases 2.1.2 (Unit 1) | Correct the typographical error which transposed the hydrotest pressure for the Reactor Coolant System from "3125 psia" to "3215 psia" in Bases 2.1.2. |
| 3. | Section 3/4.1.1.1 (Units 1 & 2) | Reinsert the asterisk (*) that provides application of the footnote in 3/4.1.1.1 to each of the three references to "the limit line of Figure 3.1-1b". |
| 4. | Specification 4.1.1.1.1 (Unit 1) | Add the word "line" after limit in this Surveillance Requirement. |
| 5. | Table 3.3-3 (Unit 2) | Make a more complete entry for Auxiliary Feedwater Actuation System of Table 3.3-3. |
| 6. | Table 3.3-5 (Unit 2) | Reinsert note (1) of Table 3.3-5 as referenced by item 4.a of the Table. |

7. Table 3.3-6 (Units 1 & 2) Correct the typographical error which transposed the trip setpoint of the Containment Purge and Exhaust Isolation Area Radiation Monitor from 220 m/hr to 200 m/hr in Table 3.3-6.
8. Table 4.3-4 (Units 1 & 2) Make "Seismic Acceleration Recorder" the title of item 3.
9. Table 3.3-11 (Units 1 & 2) Correct transcription errors in Table 3.3-11. These include an incorrect room number, transposed detector numbers, and a duplicate listing.
10. Table 3.6-1 (Unit 2) Add the isolation times associated with Containment Isolation Valves for Penetration 1A in Table 3.6-1.
11. Specification 4.6.5.1 (Units 1 & 2) Renumber the Surveillance Requirement 4.6.5.1 and 4.6.5.2 to 4.6.5.1.1 and 4.6.5.1.2.
12. Specification 3.7.1.1.a (Unit 1) Reinsert the phrase "next 6 hours and in COLD SHUTDOWN within the" into the last sentence of 3.7.1.1.a.
13. Section 3/4.7.8 (Unit 1) Correct references to Surveillance Requirements.
14. Specification 4.9.12.c (Units 1 & 2) Add the "1.52" to a reference to Regulatory Guide 1.52.
15. Section 3/4.12.1 (Units 1 & 2) Restore the title "Monitoring Program" to LCO 3/4.12.1.
16. Bases 3/4.2.2, 3/4.2.3, 3/4.2.4 (Unit 1) Delete duplicate, incorrect Bases text.
17. Bases 3/4.7.1.6 (Units 1 & 2) Remove Bases for deleted LCO 3.7.1.6 and SR 4.7.1.6.
18. Specification 6.4.1 (Units 1 & 2) Change Appendix "A" of 10 CFR Part 55 to 10 CFR 55.59(c).
19. Specification 6.5.2.2 (Unit 2) Add phrase "and shall collectively have expertise in all of the areas of 6.5.2.1" to the last sentence of 6.5.2.2.
20. Specification 6.10.2 (Units 1 & 2) Delete 6.10.2 Item 1, as it refers to requirements for Records of Environmental Qualification which no longer exist in Technical Specifications.

JUSTIFICATION

The editorial changes listed in the Requested Changes section are enhancements and corrections which need to be incorporated into the Technical Specifications.

The administrative corrections have been researched to ensure that they are administrative in nature and do not constitute a substantive change to the Technical Specifications. Details follow.

1. Table 2.2-1 (Units 1 & 2)

Technical Specification Table 2.2-1, item 9.a, indicates an allowable value for the Thermal Margin/Low Pressure trip setpoint limit of 1875 psig. This limit should be 1875 psia to be consistent with the Bases for this section. The discrepancy with the limit in question was apparently inserted by Amendment Nos. 71 and 61 for Units 1 and 2, respectively. The submittal did not request a change to the limit in question, but did identify that a change to the Bases was needed. This change was discussed in the NRC Safety Evaluation Report for Amendments 71 and 61 where it was identified as 1875 psia. Since the limit of 1875 psig is inconsistent within the amendment, and with the requests for amendment upon which it was based, BG&E requests that the trip setpoint limit of 1875 psia be correctly inserted into Table 2.2-1.

2. Bases 2.1.2 (Unit 1)

Unit 1 Technical Specification Bases 2.1.2 currently states that the "entire RCS is hydrotested at 3215 psia." The correct pressure is 3125 psia. With the issuance of Amendment 130 (Unit 1) this number was transposed from 3125 psia to 3215 psia. The amendment request had not involved this area. Since no bases exists for this change in pressure, BG&E requests that the pressure be restored to show the correct pressure as it appeared prior to Amendment 130.

3. Section 3/4.1.1.1 (Units 1 & 2)

Three references to Footnote * in the Limiting Condition for Operation and Surveillance Requirements for Technical Specification 3/4.1.1.1 were inadvertently omitted from the final pages which were issued with Amendment Nos. 130 and 123 for Units 1 and 2, respectively. The footnote remains on Technical Specification page 3/4 1-1 and continues to be applicable to the Technical Specification. Since no basis exists for the omission, BG&E requests that the Technical Specification 3/4.1.1.1 be corrected to reflect its pre-Amendment Nos. 130 and 123 references to the footnote.

4. Specification 4.1.1.1.1 (Unit 1)

The word "line" in the first sentence of Surveillance Requirement 4.1.1.1.1 was inadvertently omitted in Amendment No. 130 for Unit 1. The word was included in the amendment request but was apparently not transferred to the final pages issued with the amendment. Since no basis exists for this omission, BG&E requests that the word "line" be placed in the Surveillance Requirement as originally requested.

5. Table 3.3-3 (Unit 2)

Unit 2 Technical Specification Table 3.3-3, item 9 and 9.a were not correctly transposed from the amendment request to the amendment. The amendment request changed the values within the table itself, however upon issuance of the amendment, the phrase "Actuation System" was not included in item 9 and the term "(Trip Buttons)" was not included on item 9.a. As there is no basis for the omission of

these items from Table 3.3-3, BG&E requests that items 9 and 9.a be returned to their pre-amendment terminology and that the acronym "AFAS" be included also, for consistency with Unit 1.

6. Table 3.3-5 (Unit 2)

Footnote (1) in Technical Specification Table 3.3-5, as applied to item 4.a in Amendment Nos. 54 and 37 for Units 1 and 2, respectively, was inadvertently omitted from a subsequent Unit 2 request for amendment. This request was approved, with the error, as Unit 2 Amendment No. 61. The error in reference resulted from the incorrect use of an outdated version of the affected page in developing a markup. Later submittals also failed to identify the missing footnote. Item 4.a continues to reference the footnote and it is needed in the table. Since no basis exists for the omission, BG&E requests that Table 3.3-5 be corrected by reinserting the footnote.

7. Table 3.3-6 (Units 1 & 2)

In Technical Specification Table 3.3-6 the Alarm/Trip Setpoint for item 1.a.i is currently given as 200 mr/hr. The correct Setpoint is 220 mr/hr. It was determined that this trip setpoint was correctly issued in Amendment Nos. 99 and 81 for Units 1 and 2, respectively. However, other discrepancies were identified within that amendment for Table 3.3-6 which were subsequently corrected. When the corrected pages were issued to address the other discrepancies, the setpoint for item 1.a.i was inadvertently listed as 200 mr/hr. Since no basis exists for this discrepancy, BG&E requests that item 1.a.i in Table 3.3-6 be restored to the correct trip setpoint of 220 mr/hr, as approved by Amendment Nos. 99 and 81.

8. Table 4.3-4 (Units 1 & 2)

Item 3 under INSTRUMENTS AND SENSOR LOCATIONS (Table 4.3-4) has never had a title. All other information under INSTRUMENTS AND SENSOR LOCATIONS in this table is identical to that in Table 3.3-7. It is clear from comparing the two tables that Item 3 of Table 4.3-4 should have the title "Seismic Acceleration Recorder." BG&E requests that the title be added to this table for both units.

9. Table 3.3-11 (Units 1 & 2)

Technical Specification Table 3.3-11 currently lists information which is contrary to actual plant configuration. This information includes an incorrect room number (106 should be 116 for Unit 1), transposed detector numbers (Room 111 should have 0 FLAME and 1 SMOKE detector, while Rooms 112/114 should have 4 FLAME and 0 SMOKE detectors), and a duplicate listing (Room 113 is Unit 1 only; delete from Unit 2 list). The information was correctly listed in the amendment requests, but was apparently incorrectly transferred with the pages provided for issuance of Amendment Nos. 109 and 92 for Units 1 and 2, respectively. Since no basis exists for this discrepancy, BG&E requests that the Technical Specifications be corrected to reflect the table listings as originally requested.

10. Table 3.6-1 (Unit 2)

The isolation times associated with Containment Isolation Valves for Penetration 1A in Technical Specification Table 3.6-1 were inadvertently omitted in Amendment 47 for Unit 2. The values were correctly listed in the amendment request but were apparently not transferred with the pages provided for issuance of the amendment. Since no basis exists for this omission, BG&E requests that the isolation time values for Penetration 1A be included in the Table 3.6-1 to correctly reflect the Table values as originally requested.

11. Specification 4.6.5.1 (Units 1 & 2)

The original request for Amendment Nos. 109 and 92 for Units 1 and 2, respectively, called for the Surveillance Requirements for the Limiting Condition for Operation 3.6.5.1 to be numbered as 4.6.5.1 and 4.6.5.2. However, this numbering scheme causes confusion as the Surveillance Requirement for LCO 3.6.5.2 is also numbered 4.6.5.2. In other words, there are currently two Surveillance Requirements numbered 4.6.5.2. In order to eliminate possible confusion, BG&E requests that the Surveillance Requirements for LCO 3.6.5.1 be renumbered to 4.6.5.1.1 and 4.6.5.1.2.

12. Specification 3.7.1.1.a (Unit 1)

Unit 1 Technical Specification Action statement 3.7.1.1.a and the corresponding Unit 2 Technical Specification provide specific actions to be taken with main steam line code safety valves inoperable. Unit 2 Action statement 3.7.1.1.a concludes with "otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the next 30 hours." However, Unit 1 currently concludes this Action statement with "otherwise, be in at least HOT STANDBY within the following 30 hours." Research into the reason for this discrepancy found that prior to Amendment No. 104 (Unit 1) these two Action statements were similarly worded. Amendment No. 104 requested a change to this page but did not affect the Action statement of concern. The new page provided with the amendment omitted the phrase "next 6 hours and COLD SHUTDOWN within the". This apparently was an error in transcription. Since no basis exists for the discrepancy, BG&E requests that Unit 1 Technical Specification Action statement 3.7.1.1.a be restored to its pre-Amendment No. 104 wording.

13. Section 3/4.7.8 (Unit 1)

The Action requirement for Technical Specification 3.7.8.1 references Specification 4.7.8.b and c. Specifications 4.7.8.b and c do not exist. Examination of the subjects involved clearly shows that the reference should be to Specifications 4.7.8.1.b and c. Similarly, Surveillance Requirements 4.7.8.1.b and c each contain reference to Specification 4.7.8.d, which should be 4.7.8.1.d. These identical changes were made to Calvert Cliffs Unit 2 Technical Specifications by Amendment No. 119 on March 24, 1989, included with substantive changes that were specific to Unit 2. BG&E requests that these references be corrected in the Unit 1 Technical Specifications.

14. Specification 4.9.12.c (Units 1 & 2)

Amendment Nos. 142 and 125 for Units 1 and 2, respectively, included changes involving in-place testing of HEPA filters and charcoal adsorbers. The testing reference was changed from ANSI N510-1975 to certain parts of Regulatory Guide 1.52 in many parts of the Technical Specifications. In the last paragraph of Specification 4.9.12.c, the Regulatory Guide number was inadvertently omitted for both units when final pages were prepared. BG&E requests that the Regulatory Guide number be added to Specification 4.7.12.c for each unit.

15. Section 3/4.12.1 (Units 1 & 2)

The Limiting Condition for Operation title "3/4.12.1 Monitoring Program" was omitted from the issuance of Amendment Nos. 105 and 86 for Units 1 and 2, respectively. The title was correctly listed on the amendment request but it was apparently not transferred with the pages provided for the issuance of the amendment. Since no basis exists for this omission, BG&E requests that the title be included to correctly refer to the Limiting Condition for Operation and to correspond with the Table of Contents.

16. Bases 3/4.2.2, 3/4.2.3, 3/4.2.4 (Unit 1)

The Bases section for Unit 1 Technical Specifications 3/4.2.2, 3/4.2.3, and 3/4.2.4 contains wording which has been inadvertently duplicated on succeeding pages. This wording had also been inaccurately transferred from page B3/4 2-2 to B3/4 2-1 in the past. The wording in question was correct when issued as Amendment No. 39. Amendment 104 resulted in this text being transferred from page B3/4 2-2 to B3/4 2-1. During the transfer, the word "not" was inadvertently inserted into the last paragraph of the current page B3/4 2-1. On September 29, 1989, unrelated changes were requested to page B3/4 2-2. These Unit 1 changes were inappropriately identified in that a Unit 2 page was marked up. The Unit 2 page still contained the wording in question. The Unit 1 Bases revision was subsequently issued resulting in the wording in question being re-inserted on Unit 1 page B3/4 2-2. The discrepancy was identified at that time. Since no basis exists for this discrepancy, BG&E requests that the Technical Specification Bases be corrected to delete the duplicated text and reflect the pre-Amendment No. 104 wording.

17. Bases 3/4.7.1.6 (Units 1 & 2)

The Amendment Request, dated July 30, 1981, for Amendment Nos. 59 and 41, Units 1 and 2, respectively, requested the deletion of the Limiting Condition for Operation 3.7.1.6 and the Surveillance Requirement 4.7.1.6. However, it neglected to request deletion of the corresponding Bases. Since Limiting Condition for Operation 3.7.1.6 and Surveillance Requirement 4.7.1.6 have been deleted and there is no longer the need for Bases 3/4.7.1.6, BG&E requests that this Bases section be deleted from the Technical Specifications.

18. Specification 6.4.1 (Units 1 and 2)

Specification 6.4.1 contains a reference to Appendix "A" of 10 CFR Part 55. Appendix "A" of 10 CFR Part 55 has been changed to 10 CFR 55.59(c), as indicated

in paragraph (H)(i) of Federal Register notice 52FR9453. BG&E requests that specification 6.4.1 be changed accordingly for both units.

19. Specification 6.5.2.2 (Unit 2)

Amendment Nos. 43 and 26 for Units 1 and 2, respectively, called for changes to the composition of OSSRC. The entire change was incorporated into the Unit 1 Technical Specification 6.5.2.2. However, a portion of the change ("and shall collectively have expertise in all areas of 6.5.2.1") was not incorporated into the Unit 2 Technical Specification. As no basis exists for this discrepancy, BG&E requests that the missing phrase be included in 6.5.2.2 of Unit 2.

20. Specification 6.10.2 (Units 1 & 2)

Amendment Nos. 108 and 91 for Units 1 and 2, respectively, deleted Section 6.13 "Environmental Qualification". Section 6.13 contained schedule requirements for completion of activities involving the environmental qualification of electrical equipment important to safety that had already passed. Moreover, environmental qualification requirements had been incorporated in 10 CFR 50.49 and thus did not need to appear in the Technical Specifications. The amendment request neglected to request the deletion of 6.10.2, Item 1, which is also related to environmental qualification and which references paragraph 6.13. The current paragraph 6.13 now contains information regarding "System Integrity". This is obviously referenced incorrectly as "Environmental Qualification" through 6.10.2, Item 1. Since 10 CFR 50.49(j) duplicates and supersedes this Technical Specification, and to eliminate the discrepancy caused by 6.10.2, Item 1, BG&E requests that 6.10.2, Item 1 be deleted.

DETERMINATION OF SIGNIFICANT HAZARDS

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

- (1) *Would not involve a significant increase in the probability or consequence of an accident previously evaluated.*

The proposed changes and corrections are editorial and administrative and do not constitute a substantive change to the Technical Specifications. Therefore, the changes and corrections do not involve a significant increase in the probability or consequence of an accident previously evaluated.

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

The proposed changes and corrections do not modify the plant's configuration or operation as they are editorial and administrative. As a result, no new accident initiators are introduced. Therefore, the changes and corrections do not create the

possibility of a new or different type of accident from any accident previously evaluated.

- (3) *Would not involve a significant reduction in a margin of safety.*

As the proposed changes and corrections are editorial and administrative and do not constitute a substantive change to the Technical Specifications, the margin of safety is not affected.

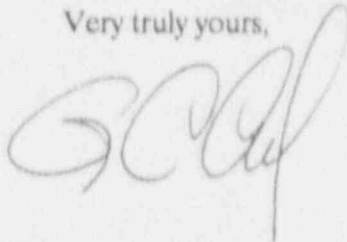
SCHEDULE

These changes are requested to be approved as soon as practicable. Issuance of this amendment does not have an impact on 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 our Off-Site Safety Review Committee, and they have concluded that implementation of these changes will not result in an undue risk to the health and safety of the public.


Very truly yours,



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

I hereby certify that on the 28 day of March, 1991, before me, the subscriber, a Notary Public of the State of Maryland and for Calvert County, personally appeared George C. Creel, 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:


Michelle D. Hall
Notary Public

My Commission Expires:

February 2, 1994
Date

GCC/LMD/lmd/dlm

cc: D. A. Brune, Esquire
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