



CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

February 23, 1983

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

Director of Nuclear Reactor Regulation
Attention: Mr. R. A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Calvert Cliffs Nuclear Power Plant
Units Nos. 1 & 2; Dockets Nos. 50-317 and 50-318
Fire Protection Scheduling Relief

Gentlemen:

Baltimore Gas and Electric Company, pursuant to 10 CFR Part 50, paragraph 50.12, hereby requests an exemption from the scheduling requirements of 10 CFR 50.48(c) for certain emergency lighting modifications required by 10 CFR 50, Appendix R, Paragraph III.J, as described below. In addition, this letter clarifies the fire detection and suppression systems which are installed in the Calvert Cliffs main control room and intake structure.

Exemption Request

10 CFR 50.48(c) states that those fire protection features that require prior NRC approval shall be implemented 6 months after NRC approval for items not requiring plant shutdown or before startup after the earliest outage of certain specified durations commencing 180 days after NRC approval for those items which do require plant shutdown. A maximum of 65 battery powered emergency lighting banks remain to be installed in Calvert Cliffs Units 1 and 2. These installations were heavily dependent on the NRC approval of equipment evaluations contained in our Interactive Cable Analyses (ICA) for Unit 1 and Unit 2. The NRC approval of these ICA's was contained in Supplement 3 to the Fire Protection Safety Evaluation Report (FPSER), dated September 27, 1982. Using the guidelines of 10 CFR 50.48(c)(4), those emergency lights whose installation does not require plant shutdown should be installed by March 27, 1983. We request an extension of this date to September 1, 1983.

Approximately five of the lighting banks are to be installed in areas which are inaccessible during normal operation. These areas are the 27' elevation west penetration rooms and the volume control tank rooms for both Units. Our interpretation of 10 CFR 50.48(c)(3) is that the installation of these lighting banks may be accomplished during the first outage of sufficient duration specified in paragraph 50.48(c)(3), and we request that you notify us if this interpretation is not correct.

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The reason for our requested extension is that, at the time of the September 27, 1982 FPSEK supplement, our engineering and planning resources were heavily committed to the imminent Unit No. 2 refueling outage, which commenced on October 16, 1982 and was completed on January 16, 1983. We were not able to include any emergency lighting modification work in that outage interval, but we did begin making the modifications after the completion of the outage. We now estimate that all of the non-outage related lighting modifications should be complete by September 1, 1983. During this same time frame, we will be adding several new jacks to the existing fire protection sound-powered phone system.

Clarification

Supplement 3 to the FPSEK, dated September 27, 1982 states in Paragraph C that ". . . all other areas of the plant not required to have an alternate shutdown system will comply with the requirements of Section III.G.2 of Appendix R . . ." Our reading of this statement leads us to conclude that it may be necessary to restate and clarify our fire protection design for two areas of the plant; namely, the control room and the intake structure. As previously documented in the NRC's FPSEK and supplements, as well as in our Fire Hazards Analyses and the NRC consultant's reviews of our analyses, we have provided for automatic fire detection and fixed (fire hose) fire suppression in those areas of the plant. We have identified the intake structure as having sufficient separation of redundant equipment and cabling so as not to require the installation of automatic sprinklers, and we have identified the control room as being continuously manned and backed up by alternative shutdown provisions, so as to not require sprinklers. Although we were confident that the NRC had acknowledged these designs as acceptable, we feel obligated to reiterate the design configuration based on the broad statement previously cited from the FPSEK Supplement. Our letter of May 14, 1982, which was the basis for the statement in the FPSEK Supplement, contained a table which identified those areas of the plant for which the cable routing was in accordance with Section III.G.2 of Appendix R and those areas which were to be modified to provide alternate safe shutdown in accordance with Section III.L. That table was constructed only as a convenience for the NRC and its consultant in reviewing our ICA's and was not intended to serve as an upgraded commitment to install automatic or manual sprinklers in either area.

We hope this clarified the design of our fire protection system within the intake structure and control room.

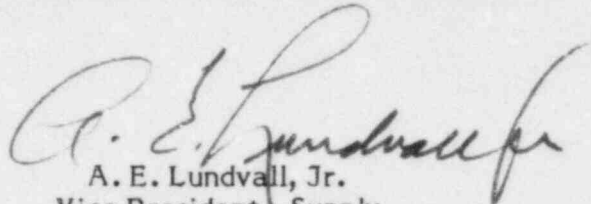
Safety Committee Review

This request for an exemption has been reviewed by our Plant Operations and Safety Review and Offsite Safety Review Committees, and they have determined that granting the exemption will not endanger life or property or the common defense and security. This conclusion is based, in part, on the fact that the installation of emergency lighting is proceeding on a priority basis with the most critical lights being installed first and commensurate with the associated equipment installations; that emergency lighting has previously been installed and approved for access and egress to and from certain areas; and that sufficient other fire protection measures exist within the plant to prevent, detect, extinguish and otherwise mitigate the effects of an incipient fire during the relatively short interval covered by the requested extension.

Fee Determination

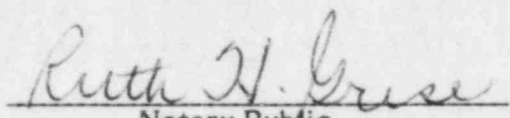
We have determined, pursuant to 10 CFR Part 170, that this request for an exemption constitutes Class III and Class I Amendments to Operating Licenses DPR-53 and DPR-69, respectively, inasmuch as a single issue is involved; and, accordingly, we are enclosing BG&E Check No. A111790 in the amount of \$4,400.00 to cover this request.

BALTIMORE GAS & ELECTRIC COMPANY

By: 
A. E. Lundvall, Jr.
Vice President - Supply

STATE OF MARYLAND :
CITY OF BALTIMORE : **TO WIT:**

Arthur E. Lundvall, Jr., being duly sworn, states that he is Vice President of the Baltimore Gas and Electric Company, a Corporation of the State of Maryland; that he executed the foregoing for the purposes therein set forth; that the statements made therein are true and correct to the best of his knowledge, information, and belief; and that he was authorized to execute the same on behalf of said Corporation.

WITNESS My Hand and Notarial Seal: 
Notary Public

My Commission Expires: July 1, 1986
Date

AEL/RCLO/gvg

Enclosure

- cc: J. A. Biddison, Jr., Esq.
- G. F. Trowbridge, Esq.
- Mr. D. H. Jaffe, NRC
- Mr. R. E. Architzel, NRC

bcc: Messrs. A. E. Lundvall, Jr.
G. C. Creel
R. M. Douglass
R. H. Kent
S. A. Rittenhouse
J. A. Tiernan/D. W. Latham
R. F. Ash/File
J. T. Carroll/G. S. Pavis
C. H. Cruse/T. N. Pritchett
S. E. Jones
P. E. Katz
B. S. Montgomery
R. C. L. Olson
M. D. Patterson
A. R. Thornton/J. M. Dahlquist, Jr.
E. "R" Zumwalt