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GEORGE C. CREEL  
VICE PRESIDENT  
NUCLEAR ENERGY  
(202) 260-4455

May 20, 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  
Supplemental Information to License Amendment Request  
(TAC Nos. 79236 & 79237)

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REFERENCE: (a) Letter, Mr. G. C. Creel (BG&E) to US NRC Document Control Desk, dated November 7, 1990, "Request for Amendment to Operating Licenses"

Gentlemen:

The Baltimore Gas and Electric Company requested an amendment to its Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 & 2, respectively, with the referenced submittal of proposed changes to the Technical Specifications. The justification for these changes included: a) requiring consistent actions for similar situations within Mode 5 and 6 in the Calvert Cliffs Technical Specifications, and b) specifying achievable actions for containment closure in Modes 5 and 6.

Currently, Specifications 3.8.2.2 and 3.8.2.4 require containment integrity in Modes 5 and 6. However, containment integrity is defined in terms of requirements met during Modes 1 through 4, but not required in Modes 5 and 6. In some situations in Modes 5 & 6, it is either not practical or possible to implement full containment integrity. Therefore, the current Specifications are sometimes unworkable. This change will provide a needed clarification of the actual required actions for the given conditions. This clarification will provide workable actions that prevent initiation of design basis events during shutdown operations while still achieving the necessary level of containment closure to successfully mitigate these events should they occur.

Two minor revisions have been identified as necessary through discussion with the Nuclear Regulatory Commission (NRC) Staff. These revisions are discussed further below and shown on the attached marked pages. These pages completely supersede those previously submitted with Reference (a).

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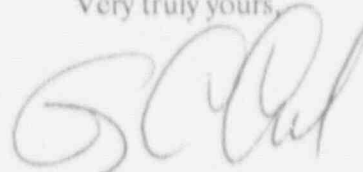
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The first revision is to the applicability of Specification 3.9.4. The requested changes to Specifications 3.8.1.2, 3.8.2.2 and 3.8.2.4 each require through their respective Action statements to "establish containment penetration closure as identified in Specification 3.9.4..." The reference to Specification 3.8.1.2 should be included in the Applicability statement proposed for Specification 3.9.4 in the license amendment request. Specification 3.8.1.2, as proposed, will contain the same requirement to "establish containment penetration closure as identified in Specification 3.9.4" as the proposed Specifications 3.8.2.2 and 3.8.2.4. Therefore, the last phrase of the Applicability statement for Specification 3.9.4 is requested to be revised to read "... and electrical power system degradation as required by Specifications 3.8.1.2, 3.8.2.2 and 3.8.2.4." This is an administrative change for consistency with the requested revisions to Specifications 3.8.1.2, 3.8.2.2 and 3.8.2.4, and does not impact the previously provided significant hazards consideration discussion.

The second revision is to revise the time frame for item c of the required Actions for Specifications 3.8.1.2, 3.8.2.2 and 3.8.2.4. Each of these was requested to require action within one hour to initiate corrective actions to restore the required equipment to the required status. This time frame is requested to be revised to "immediately". While both of these time frames are considered to essentially require action as soon as possible, "immediately" is requested to be used to provide an additional sense of urgency. Further, to provide Actions in chronological order, Actions "b" and "c" have been reversed. Both of these changes are consistent with the original purpose of the proposed amendment. These revisions have been determined to not impact the previously provided significant hazards consideration discussion.

Should you have any further 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 20th day of May, 1991, before me, the subscriber, a Notary Public of the State of Maryland in 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:

Donna L. McCready  
Notary Public

My Commission Expires:

Jan. 1, 1994  
Date

GCC/ERG/erg/dlm

Attachments

Document Control Desk

May 20, 1991

Page 3

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
R. A. Capra, NRC  
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