

ROBERT E. DENTON
Vice President
Nuclear Energy

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 586-2200 Ext. 4455 Local
410 260-4455 Baltimore



December 19, 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
Response to Request by the NRC Staff to Use the Calvert Cliffs Nuclear Power
Plant, Unit No. 1, Probability Risk Assessment Data

REFERENCE: (a) Letter from Mr. D. G. McDonald, Jr. (NRC) to Mr. R. E. Denton (BGE),
dated April 20, 1994, "Use of the Calvert Cliffs Nuclear Plant, Unit 1,
Probability Risk Assessment Data by the NRC Staff"

In Reference (a), you requested that we voluntarily provide Probability Risk Assessment (PRA) data for inclusion in the Nuclear Regulatory Commission (NRC) "library" of plants. We support the NRC program which we understand will use plant-specific PRA data to evaluate significant events, resolve generic safety issues and respond to "what if" type questions. Its potential benefits to the NRC and the Nuclear Industry are evident. We would like to participate in the program starting in mid-1996. Between now and early 1996, our PRA model will be undergoing a number of upgrades after which we expect our PRA data will become more stable. We suggest that it would be wasteful for the NRC staff to load current Calvert Cliffs PRA data and then find that the NRC model was not consistent with our model.

The following reasons support our decision to defer participating in the program until mid-1996:

- ♦ The current PRA credits no modifications completed since 1992. A number of significant plant modifications, including the new Emergency Diesel Generators, will be completed by 1996 and, therefore, credited in the PRA. Currently, we anticipate fewer significant plant modifications after 1996 and, therefore, expect the PRA to become more stable.
- ♦ Maintenance rule indicator development has necessitated some modeling changes and data upgrades to our PRA.

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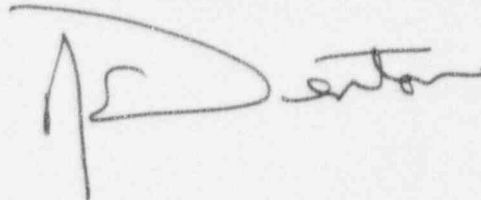
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- ◆ During discussions with the NRC contractor, we learned that considerable NRC rework was required when one plant upgraded their PRA while the contractor was loading the earlier PRA data.
- ◆ During subsequent discussions, the NRC contractor informed us that the size of our PRA may exceed the capability of the NRC's software.

We would like to be kept apprised of the status of the NRC's program. We are especially interested in knowing if the capability of the NRC software is consistent with the size of our PRA.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "J. E. Silberg". The signature is written in a cursive style with a large, sweeping initial "J" and "E".

RED/JMO/bjd

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
L. B. Marsh, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSC