BALTIMORE
GAS AND
ELECTRIC

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

ARTHUR E. LUNDVALL, JR
VICE PRESIDENT
SUPPLY

December 23, 1982

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 2, Docket 50-318
Request for Amendment

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its Operating License No. DPR-69 for Calvert Cliffs Unit No. 2, with the submittal of the enclosed proposed changes to the Technical Specifications.

PROPOSED CHANGE (BG&E FCR 82 214)

Change the measurement range for the following instruments listed on Table 3.3-9 (page 3/4 3-38). For Reactor Coolant Cold Leg Temperature, change the measurement range from 0-600°F to 212 -705 F. For steam generator level, change the measurement range from -116 to +63.5 inches to -401 to +63.5 inches. Delete the designation 2C43 listed under readout location for Wide Range Neutron Flux and add a footnote symbol in place of the 2C43 designation. Add a footnote to the bottom of page 3/4 3-38 with the following words, "Wide Range Neutron Flux monitors are located on the instrumentation cabinets located in the Auxiliary Feedwater pump room".

DISCUSSION AND JUSTIFICATION

In this submittal, we are proposing changes to Table 3.3-9 to facilitate entry into MODE 3 following core reload cycle 5 modifications. The changes being requested in this submittal support the current schedule for completion of refueling activities on Unit 2 and facilitate a return to power operations following core reload cycle 5.

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The operability of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of the Hot Standby mode from locations outside of the Control Room.

NUREG 0737, Item II.F.2, requires the installation of instrumentation for detection of inadequate core cooling. Accordingly, subcooled margin monitors have been installed utilizing, among other inputs, existing temperature measurement channel inputs. The initial installation of the subcooled margin monitors utilized Reactor Coolant System (RCS) T_c narrow range temperature inputs and the detection range of the subcooled margin monitor was limited by the measurement range provided by the cold leg temperature measurement channels. The design of the subcooled margin monitors precludes providing any representative engineering data at temperature measurement ranges less than 212°F (boiling point of water at standard pressure) or greater than 705°F (critical point of water). The guidance contained in Reg. Guide 1.97 suggested modifications to provide temperature measurement ranges of 150° to 750°F. Since temperature measurement ranges below the boiling point or above the critical point of water provided no useful input to the subcooled margin monitors and produced the undesirable effect of greater inaccuracy over the extended measurement ranges, we selected a limited T_c measurement range between the two points that would provide useful input to the subcooled margin monitors. Accordingly, we have modified the RCS T_c measurement channels to provide indication over the range of 212° to 705°F.

The operability of remote shutdown instrumentation implies the ability to monitor reactor coolant temperature to permit shutdown and maintenance of the Hot Shutdown mode. The Hot Shutdown mode (MODE 3) as provided in the Technical Specifications defines the average coolant temperature as greater than or equal to 300°F. The ability to measure RCS temperature for maintenance of the Hot Standby mode is included by the proposed T_c measurement channel range. Therefore, this change does not reduce the margin of safety described in the FSAR or the analysis for core reload cycle 4.

Steam generator level measurement has been modified to provide an extended range of level indication. All modifications have been performed to safety grade standards. The steam generator level measurement channel provides indication at the remote shutdown panel (2C43) and does not provide any control functions at the panel. The addition of wide range level indication provides the operator with more representative information of actual steam generator inventory. Accordingly, this change does not reduce the margin of safety described in the FSAR or the analysis for core reload cycle 4.

As a result of implementing certain modifications associated with the addition of auxiliary feedwater third train capability, the remote shutdown panel has been moved to a location nearer to the control room. Wide range neutron flux instrumentation has been temporarily deleted from the new remote shutdown panel and left in place in its original location in the auxiliary feedwater pump room. This instrumentation provides indication of neutron flux levels at power levels less than 4×10^{-7} % in the post trip condition. The ability to monitor wide range neutron flux from locations outside the control room has not changed as a result of current modifications. Therefore, this change does not reduce the margin of safety described in the FSAR or the analysis for core reload cycle 4.

All proposed changes to the Technical Specifications listed in this submittal have been incorporated under modifications associated with Post-TMI requirements. These requirements serve to upgrade the existing design of the facility. These proposed changes do not constitute an unreviewed safety question.

SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications have been reviewed by our Plant Operations and Safety and Off-Site Safety Review Committees, and they have concluded that implementation of these changes will not result in an undue risk to the health and safety of the public.

FEE DETERMINATION

We have determined, pursuant to 10 CFR Part 170, paragraph 170.22, that this Amendment request consists of a Class III amendment for Calvert Cliffs Unit No. 2, and accordingly, we are including Baltimore Gas and Electric Company Check No. A110829 in the amount of $4,000.00 to cover the fee for this request.

BALTIMORE GAS AND ELECTRIC COMPANY

A. E. Lundvall Jr.

Vice President - Supply

AEL/LOW/sjb

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

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 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:

Ruth H. Grese
Notary Public

My Commission Expires

July 1, 1986

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC