



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 164 TO FACILITY OPERATING LICENSE NO. DPR-53
AND AMENDMENT NO. 144 TO FACILITY OPERATING LICENSE NO. DPR-69
BALTIMORE GAS AND ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-317 AND 50-318

1.0 INTRODUCTION

By letter dated August 27, 1991, as superseded by letter dated August 30, 1991, the Baltimore Gas and Electric Company (the licensee) submitted a request for changes to the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, Technical Specifications (TS). The requested changes would revise TS Table 4.3-2 and adds Note 2 for both Units 1 and 2 to allow the Safety Injection Actuation Signal (SIAS) logic that starts the emergency diesel generators (EDGs) to be moved to a different subchannel of the SIAS. TS Table 4.3-2, Notes 3 through 6, wording is changed from "may be" to "are." These notes identify the logic circuits which are currently exempted from testing during power operation. The change also deletes TS 5.4.6.1.8 which provides limiting conditions for operation (LCO) and surveillance requirements for the containment vent isolation valves.

2.0 EVALUATION

TS Table 4.3-2, "Engineered Safety Feature Actuation System Instrumentation Surveillance Requirements," includes the SIAS automatic actuation logic, Item 1.d, as requiring a channel functional test on a monthly basis when the units are operating in Modes 1, 2 or 3. The SIAS activates over 90 pieces of safety-related equipment. The SIAS is divided into two logic channels, A and B, of which each is further subdivided into 10 subchannels designated channels 1 through 10. The subchannels to which the safety-related equipment is assigned is provided in the Updated Final Safety Analysis Report, Section 7.3.2.2. The SIAS automatic actuation logic for the EDGs is currently assigned to subchannel 9 for each of the two logic channels A and B. Subchannel 9, for each logic channel, also has several isolation valves, vent valves, sample valves, and containment purge fans assigned to them. The proposed change will assign the SIAS signals for starting the EDGs to subchannel 10 of each of the two logic channels. The requested change will not modify the surveillance requirements currently specified in TS Table 4.3-2 for any of the safety-related equipment, including the EDGs.

TS 4.8.1.1.2 provides additional surveillance requirements necessary for the EDGs to demonstrate their operability. The procedures used for doing the SIAS automatic actuation logic testing and the procedures for doing the EDG

operability testing can be simplified and could allow the EDGs to be tested separate from the other SIAS automatic actuation logic testing. This results in less complicated procedures and allows flexibility in performing the required EDGs surveillance testing of both the SIAS automatic actuation logic and operability.

We have determined that this portion of the proposed changes is acceptable since none of the surveillance requirements are reduced and an overall improvement in the testing process will result from less complicated testing procedures.

The request also adds a Table Notation to Table 4.3-2 and requests changes to existing Table Notations 1 through 3. Subchannel 10 for each of the two logic channels has four safety injection tank (SIT) isolation valves assigned to them. These valves are currently exempted from the monthly surveillance testing and are only required to be tested on an 18-month frequency during shutdown. The proposed Table Notation 2 will require that the subchannels, A-10 and B-10, be tested monthly with the exception of the SIT isolation valves which will be tested at least once per 18 months during shutdown. The requested change to Table Notations 3 through 6 is to replace the words "may be" with "are." These Table Notations identify logic circuits in Table 4.3-2 which are currently exempted from monthly testing during operation but are required to be tested once per 18 months during shutdown, as are the SIT isolation valves previously discussed.

We have determined that the addition of Table Notation 2 is acceptable in that it assures the EDGs will be tested on a monthly basis and that the SIT isolation valves will be tested once per 18 months during shutdown. We have also determined the word changes in Table Notations 3 through 6 are also acceptable in that they provide a more clear and concise statement of the testing exemptions which have been previously approved.

The application also requested that TS 3/4.6.1.8 which provides LCO and surveillance requirements for the containment vent isolation valves be deleted. The requirements of TS 3/4.6.1.8 were approved in Amendment Nos. 115 and 98 for Units 1 and 2, respectively. TS 3/4.6.1.8 includes a footnote indicating that its requirements shall be deleted upon initial operability of the containment radiation signal (CRS) to containment isolation valves MOVs 6900 and 6901.

By letter dated June 18, 1991, the NRC indicated that it would process an administrative TS change to remove TS 3/4.6.1.8 when the CRS is available and operable to automatically isolate MOVs 6900 and 6901 on receipt of a high containment radiation signal when operating in Modes 1 through 4. Your letter dated June 28, 1991, informed the NRC that the required modifications have been completed and the required isolation signals are available and operable for both units.

We have determined that the deletion of TS 3/4.6.1.E is acceptable in view of the availability and operability of the required isolation signals on the isolation valves MOVs 6900 and 6901.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Maryland State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (56 FR 47230). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor:
D. McDonald

Date: October 31, 1991

Mr. G. C. Creel

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A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

Original Signed By:
Janiel G. McDonald, Senior Project Manager
Project Directorate 1-1
Division of Reactor Projects - 1/11
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 164 to DPR-53
- 2. Amendment No. 144 to DPR-69
- 3. Safety Evaluation

cc w/enclosures:
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DATED: October 31, 1991

AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. DPR-53-CALVERT CLIFFS UNIT 1
AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. DPR-69-CALVERT CLIFFS UNIT 2

Docket File

NRC & Local PDRs

PDI-1 Reading

S. Varga, 14/E/4

J. Calvo, 14/A/4

R. Capra

C. Vogan

D. McDonald

C. Cowgill

OGC-WF

D. Hagan, 3302 MNBB

C. Liang, 8/E/23

G. Hill (8), P-137

Wanda Jones, P-130A

C. Grimes, 11/F/23

ACRS (10)

GPA/PA

OC/LFMB

Plant File

F. Rosa, 7/E/4

C. McCracken, 8/D/1

cc: Plant Service list