



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

ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

February 3, 1984

Director of Nuclear Reactor Regulation  
Attention: Mr. J. R. Miller, 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  
Request for Modification of March 16, 1983 Order

Gentlemen:

The Baltimore Gas and Electric Company hereby requests relief from the schedular requirements imposed by the Nuclear Regulatory Commission Order dated March 16, 1983, amounting to one additional refueling cycle for each unit, with regard to installation of the Noble Gas Steam Effluent Monitor.

#### BACKGROUND

By our letter dated February 18, 1983 we informed you that we were experiencing difficulties in the procurement and installation of an acceptable noble gas steam effluent monitor as required by Item II.F.1.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements." We explained that deficiencies of sufficient magnitude had been discovered during our vendor's (Kaman Instrumentation) qualification testing program such that conformance with Item II.F.1.1 would take significantly longer than expected. As a result of negotiations with your staff, we stated that we would make every reasonable effort to resolve our vendor-related difficulties and provide operational monitors at Calvert Cliffs before March 1, 1984. On March 16, 1983 you issued an Order confirming this commitment.

Please be informed that the aforementioned deficiencies have persisted to the degree that we feel it is now necessary to request schedular relief until June 31, 1985 for Unit 1 and December 31, 1985 for Unit 2. In addition to these deficiencies, problems have been identified in the manner in which the vendor and his testing organization have implemented their quality assurance programs.

The Kaman Instrumentation noble gas steam effluent monitor consists of a shielded detector located in the main steam penetration room, triaxial cabling, and a ratemeter with associated electronics located in the control room. The shielded detector assemblies are seismically mounted adjacent to the main steam line piping upstream of

B402080272 B40203  
PDR ADCK 05000317  
P PDR

A046  
1/0

the atmospheric dump valves. While qualification problems have been experienced with both the detector assembly and the ratemeter module, ratemeter operational failures have been the primary source of our problems. These problems resulted in repeated delays in the monitor's shipment date, which was originally scheduled for early 1982. After direct involvement by BG&E technical personnel during the summer and fall of 1982, the ratemeter passed the factory acceptance test.

We took delivery of four ratemeter modules (two per unit) in November 1982. Installation of the four monitors was completed in the Summer of 1983 after all of the required mounting hardware had been received. At the time, it was our intention to demonstrate acceptable system performance during normal operations prior to the March 1, 1984 deadline and to pursue successful qualification of the ratemeter on a separate basis.

Within one month after activation of the ratemeters, three out of the four had failed for undetermined reasons. We have since returned them to the vendor for repair under warranty and hope to have them re-delivered and installed at Calvert Cliffs this Spring.

Meanwhile, we have had little success in the area of seismic and environmental qualification. Just prior to our submittal of February 18, 1983 requesting schedular relief, the ratemeter had failed a seismic qualification test. In June 1983 we received a schedule from Kaman for the performance of supplementary qualification testing and analysis and for supplying technical manuals and the qualification test results. According to that schedule, all qualification and documentation activities were to have been completed by October 1983.

During the Summer of 1983 the vendor failed to satisfy various provisions of his qualification schedule. Consequently, we made additional inquiries on the status of testing. As a result of these inquiries, on August 30, 1983 the vendor submitted a new procedure for repeating the seismic test. Upon review by our engineering and quality assurance personnel, this procedure was rejected on September 26, 1983 as inadequate.

Based on the results of this review and our overall experience with Kaman, we cannot be optimistic that this vendor will satisfy our needs in the areas of final qualification and ongoing operational support. Therefore, it is our intention to investigate the feasibility of procuring and installing an acceptable replacement monitoring system. Unfortunately, we expect that any replacement program may require additional outage related work to complete. Thus, we request schedular relief from the deadline imposed by the March 16, 1983 Order to cover one additional refueling cycle for each unit. During this time period we will continue to implement the compensatory measures referenced in the subject Order. In addition, we will continue to pursue reinstallation of the repaired Kaman monitors after they have been received from the vendor's shop.

#### JUSTIFICATION

This request does not involve a reduction in the margin of safety of operations at Calvert Cliffs, as the noble gas steam effluent monitor will not serve a safety-related function. The purpose of the monitor, as stated Section 2.1.8.b of NUREG-0578, "Short-Term Lessons Learned," (dated July 18, 1979), is to "... provide meaningful release information for offsite emergency actions." The monitor will not provide any information that is required by the operators to safely shut down the plant in

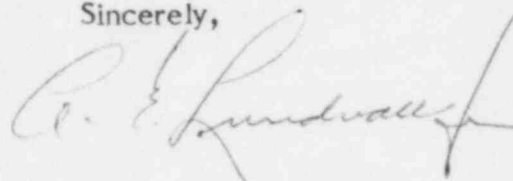
February 3, 1984

the event of an accident. Dedicated portable instrumentation, when used in conjunction with other plant effluent and process radiation monitors, constitute an adequate interim means for post-accident monitoring of secondary system radiological effluents.

We regret the need to request additional schedular relief on this TMI Action Item as it has always been our desire to satisfy this regulatory requirement as expeditiously as possible. However, we also realize that in serving the interest of the public health and safety in the long term, the circumstances of this case mandate the course of action we have described above.

We would be pleased to discuss this matter with you further, should you have any questions.

Sincerely,



AEL/BSM/vf

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