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February 28, 1992

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
Revision to Request for License Amendment

REFERENCE: (a) Letter from Mr. G. C. Creel (BG&E) to NRC Document Control Desk, dated March 28, 1991

Gentlemen:

By letter dated March 28, 1991, Baltimore Gas & Electric Company requested an Amendment to its Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 and 2. The amendment was noticed in the Federal Register on May 1, 1991 (FR 20028). The amendment requests editorial changes and administrative corrections to the Licenses and Technical Specifications for Unit Nos. 1 and 2. The attachment to our March 28, 1991 submittal is superseded by the attachments of this letter. This letter describes additional administrative corrections requested by this amendment. For clarity, all requested changes are described below with the new items denoted with an asterisk.

The editorial changes made throughout the Licenses and Technical Specifications for both Units will encompass the following items:

- ♦ Make all pages Unit specific
- ♦ Make all pages single-sided
- ♦ Remove all intentionally blank pages
- ♦ Renumber pages which are alpha-numeric
- ♦ Place Defined Terms (Section 1.0) in alphabetical order
- ♦ Capitalize the first letter of system names
- ♦ Rename the "Index" to the "Table of Contents"

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- ◆ Add numbers to the LCO titles so that they are consistent with the Table of Contents
- ◆ Renumber the Figures and Tables so that they are in numerical order and change references accordingly
- ◆ Correct obvious typographical errors
- ◆ Remove outdated footnotes (see Attachment 1)

In addition to the editorial changes, this amendment will make several administrative corrections. These were determined to be administrative in nature after being researched to ensure that they do not constitute a substantive change to the Technical Specifications. The requested corrections are briefly described below with the detailed justification discussed in Attachment (2) to this letter.

- 1.* Facility Operating License (Unit 1) Delete the requirement for an "Optimum Cooling Tower System" from the license.
- 2.* Facility Operating License (Unit 2) Delete the "Incomplete Construction Items, Tests and Other Items" requirements from the license.
- 3.* Facility Operating License (Unit 2) Delete the "Additional Reactivity and Power Distribution Surveillance" from the license.
4. Table 2.2-1 (Units 1 & 2) Correct the typographical error which changed the units for the Thermal Margin/Low Pressure Allowable Value Limit from "psia" to "psig".
5. Bases 2.1.2 (Unit 1) Correct the typographical error which transposed the hydrotest pressure for the Reactor Cooling System from "3125 psia" to "3215 psia" in Bases 2.1.2.
- 6.* Bases 2.1.2 (Units 1 & 2) Correct the reference to ANSI 3.1.7 from 1969 to 1968.
7. Section 3/4.1.1.1 (Units 1 & 2) Reinsert the asterisk (*) that provides application of the footnote in 3/4.1.1.1 to each of the three references to "the limit line of Figure 3.1.1-1".
8. Specification 4.1.1.1.1 (Unit 1) Add the word "line" after limit in this Surveillance Requirement.
9. Table 3.3-3 (Unit 2) Make a more complete entry for Auxiliary Feedwater Actuation System of Table 3.3-3.
10. Table 3.3-5 (Unit 2) Reinsert note (1) of Table 3.3-5 as referenced by Item 4.a of the Table.

11. Table 3.3-6 (Units 1 & 2) Correct the typographical error which changed the trip setpoint of the Containment Purge and Exhaust Isolation Area Radiation Monitor from 220 mr/hr to 200 mr/hr in Table 3.3-6.
12. Table 4.3-4 (Units 1 & 2) Make "Seismic Acceleration Recorder" the title of Item 3.
13. Table 3.3-11 (Units 1 & 2) Correct transcription errors in Table 3.3-11. These include an incorrect room number, transposed detector numbers, and a duplicate listing.
- 14.* Table 3.3-11 (Unit 1) Change the name of the instrument location for Unit 1, Room 224 from "12 MSIV Hyd Area" to "East Piping Area".
- 15.* Table 3.3-11 (Unit 1) Change the name of the instrument location for Room Numbers 586-590, 592, 593, 595-597, 521, and 523.
16. Table 3.6-1 (Unit 2) Add the isolation times associated with Containment Isolation Valves for Penetration 1A in Table 3.6-1.
17. Specification 4.6.5.1 (Units 1 & 2) Renumber the Surveillance Requirement 4.6.5.1 and 4.6.5.2 to 4.6.5.1.1 and 4.6.5.1.2.
18. Specification 3.7.1.1.a (Unit 1) Reinsert the phrase "next 6 hours and in COLD SHUTDOWN within the" into the last sentence of 3.7.1.1.a.
19. Section 3/4.7.8 (Unit 1) Correct references to Surveillance Requirements.
- 20.* Specification 3.7.11.5 (Units 1 & 2) Place items 3.7.11.5.a and 3.7.11.5.b before the Applicability statement.
21. Specification 4.9.12.c (Units 1 & 2) Add the "1.52" to a reference to Regulatory Guide 1.52.
22. Section 3/4.12.1 (Units 1 & 2) Restore the title "Monitoring Program" to LCO 3/4.12.1.
23. Bases 3/4.2.2, 3/4.2.3, 3/4.2.4 (Unit 1) Delete duplicate, incorrect Bases text.
24. Bases 3/4.7.1.5 (Units 1 & 2) Remove Bases for deleted LCO 3.7.1.6 and SR 4.7.1.6.
25. Specification 6.4.1 (Units 1 & 2) Change Appendix "A" of 10 CFR Part 55 to 10 CFR 55.59(c).
- 26.* Specification 6.4.2 (Units 1 & 2) Change the name of the individual responsible for the Fire Brigade Training Program.

27. Specification 6.5.4.2 (Unit 2) Add phrase "and shall collectively have expertise in all of the areas of 6.5.4.1" to the last sentence of 6.5.4.2.
28. Specification 6.10.2 (Units 1 & 2) Delete 6.10.2 Item 1, as it refers to requirements for Records of Environmental Qualification which no longer exist in Technical Specifications.

PROCESS

In order to improve the quality of the Technical Specifications, a third party was contracted to retype the entire document (Licenses and Technical Specifications) and verify its accuracy. Attachment (3) is their certification that the document is an accurate retyping of the BG&E-supplied Technical Specifications. Additionally Attachment (3) outlines the process used to generate the document and verify its accuracy.

To further ensure the accuracy of this retyping, BG&E performed a 100% verification of the equations, numerical values, graphs, scientific notation, and the text after the third party certification.

CAMERA READY PAGES

Attachments (4) and (5) to this letter contain the camera ready pages for Units 1 and 2, respectively. As the entire License and Technical Specifications for both Units are being transmitted, we have placed the new Amendment numbers on the pages. All other Amendment numbers have been removed.

DETERMINATION OF SIGNIFICANT HAZARDS

This revision will have no impact on the proposed determination of significant hazards considerations submitted in Reference (a). The basis for this conclusion rests on the fact that the additional items are administrative in nature and do not constitute a substantive change to the Technical Specifications. Given this, our decision to include these items in the License Amendment request is consistent with the previous approach. Therefore, the significant hazards analysis proposed in Reference (a) remains valid.

ATTACHMENT (1)

DELETED FOOTNOTES

1. Specification 4.4.10.1.1 (Unit 1 and 2)
Delete the time requirement for RCP flywheel inspection for the first *J* service Inspection as it is no longer applicable.
2. Specification 4.7.8.1 (Unit 1 and 2)
Delete the footnote for Steam Generator Snubbers 1-63-13 through 1-63-28 as it is no longer applicable.
3. Bases 3/4.1.2 and 3/4.1.3 (Units 1 and 2)
Delete the footnote referring to the NRC letter revision date of 9/11/91 as it has been superseded.
4. Bases 3/4.2.1 (Units 1 and 2)
Delete the footnote referring to the NRC letter revision date of 7/18/91 as it has been superseded.
5. Bases 3/4.2.5 (Unit 1)
Delete the footnote referring to the NRC letter revision of date of 5/23/90 as it has been superseded.
6. Bases 3/4.6.1.4, 3/4.6.1.7 and 3/4.6.2.2 (Units 1 and 2)
Delete the footnote referring to the NRC letter revision of date of 5/23/90 as it has been superseded.
7. Specification 6.1 and 6.2 (Units 1 and 2)
Delete the page replacement footnote as this page was updated with Amendments 161/141 and it is no longer applicable.

ATTACHMENT (2)

ADMINISTRATIVE CORRECTIONS

1.* Facility Operating License (Unit 1)

The current Facility Operating License has a requirement for BG&E to complete the preliminary design and engineering work to select an optimum cooling tower system prior to exceeding 60% power in the initial plant startup. This item has been completed and was documented in a letter from BG&E to the NRC dated January 30, 1975. As this license requirement has been met, BG&E requests that the requirement for the cooling tower study be removed from the Facility Operating License.

2.* Facility Operating License (Unit 2)

The current Facility Operating License has a requirement for BG&E to complete certain construction items, pre-operational tests, startup tests and other items prior to operation of the facility in specified modes or beyond specified dates. There are two test items and one inspection item regarding snubbers which fall into these categories. All three items were completed and documented in letters from the NRC to BG&E (December 3, 1976, and January 28, 1977). The requirements for these items have been met. Consequently, BG&E requests that the requirements for "Incomplete Construction Items, Tests and Other Items" be removed from the license.

3.* Facility Operating License (Unit 2)

The current Facility Operating License has a requirement to perform an additional reactivity and power distribution surveillance prior to the first refueling outage. This item was completed and documented in a letter from BG&E to the NRC dated September 9, 1977. As this license requirement has been met, BG&E requests that the requirements for the additional reactivity and power distribution surveillance be removed from the license.

4. Table 2.2-1 (Units 1 & 2)

Technical Specification Table 2.2-1, item 9.a, indicates an allowable value for the Thermal Margin/Low Pressure trip setpoint limit of 1875 "psig". This limit should be 1875 "psia" to be consistent with the Bases for this section. The discrepancy with the limit in question was apparently inserted by Amendment Nos. 71 and 61 for Units 1 and 2, respectively. The submittal did not request a change to the limit in question, but did identify that a change to the Bases was needed. This change was discussed in the NRC Safety Evaluation Report for Amendments 71 and 61 where it was identified as 1875 psia. Since the limit of 1875 psig is inconsistent within the amendment, Baltimore Gas and Electric Company (BG&E) requests that the correct trip setpoint limit of 1875 psia be inserted into Table 2.2-1.

ATTACHMENT (2)

ADMINISTRATIVE CORRECTIONS

10. Table 3.3-5 (Unit 2)

Footnote (1) in Technical Specification Table 3.3-5, as applied to item 4.a in Amendment Nos. 54 and 37 for Units 1 and 2, respectively, was inadvertently omitted from a subsequent Unit 2 request for amendment. This request was approved, with the error, as Unit 2 Amendment No. 61. The error in reference resulted from the incorrect use of an outdated version of the affected page in developing a markup. Later submittals also failed to identify the missing footnote. Item 4.a continues to reference the footnote and it is needed in the table. Since no basis exists for the omission, BG&E requests that Table 3.3-5 be corrected by reinserting the footnote.

11. Table 3.3-6 (Units 1 & 2)

In Technical Specification Table 3.3-6 the Alarm/Trip Setpoint for item 1.a.i is currently given as 200 mr/hr. The correct Setpoint is 220 mr/hr. It was determined that this trip setpoint was correctly issued in Amendment Nos. 99 and 81 for Units 1 and 2, respectively. However, other discrepancies were identified within that amendment for Table 3.3-6 which were subsequently corrected. When the corrected pages were issued to address the other discrepancies, the setpoint for item 1.a.i was inadvertently listed as 200 mr/hr. Since no basis exists for this discrepancy, BG&E requests that item 1.a.i in Table 3.3-6 be restored to the correct trip setpoint of 220 mr/hr, as approved by Amendment Nos. 99 and 81.

12. Table 4.3-4 (Units 1 & 2)

Item 3 under INSTRUMENTS AND SENSOR LOCATIONS (Table 4.3-4) has never had a title. All other information under INSTRUMENTS AND SENSOR LOCATIONS in this table is identical to that in Table 3.3-7. It is clear from comparing the two tables that Item 3 of Table 4.3-4 should have the title "Seismic Acceleration Recorder." BG&E requests that the title be added to this table for both units.

13. Table 3.3-11 (Units 1 & 2)

Technical Specification Table 3.3-11 currently lists information which is contrary to actual plant configuration. This information includes an incorrect room number (106 should be 116 for Unit 1), transposed detector numbers (Room 111 should have 0 FLAME and 1 SMOKE detector, while Rooms 112/114 should have 4 FLAME and 0 SMOKE detectors), and a duplicate listing (Room 113 is Unit 1 only; delete from Unit 2 list). The information was correctly listed in the amendment requests, but was apparently incorrectly transferred with the pages provided for issuance of Amendment Nos. 109 and 92 for Units 1 and 2, respectively. Since no basis exists for this discrepancy, BG&E requests that the Technical Specifications be corrected to reflect the table listings as originally requested.

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ADMINISTRATIVE CORRECTIONS

14.* Table 3.3-11 (Unit 1)

Technical Specification Table 3.3-11 currently lists Room 224 as the "12 MSIV Hyd Area." This name is inconsistent with the listing in the Alarm Manual and plant practice. This manual refers to Room 224 as the "East Piping Area". To provide consistency between the Technical Specifications and the Alarm Manual and plant practice, BG&E requests that the name be changed to "East Piping Area."

15.* Table 3.3-11 (Unit 1)

Technical Specification Table 3.3-11 currently lists 20 smoke detectors for the Radiation Chemistry area (Rooms 586-590, 592, 593, 595-597) and the corridors (Rooms 521, 523). The room numbers and instrument location names are not consistent with the actual locations in the Auxiliary Building. The location of the instruments has not changed. The area was refurbished and the Technical Specifications do not reflect the current room numbers and names. In order to correctly reflect this area of the Auxiliary Building in the Fire Detection Instrument Table, BG&E requests that the room numbers and instrument location names be changed.

16. Table 3.6-1 (Unit 2)

The isolation times associated with Containment Isolation Valves for Penetration 1A in Technical Specification Table 3.6-1 were inadvertently omitted in Amendment 47 for Unit 2. The values were correctly listed in the amendment request but were apparently not transferred with the pages provided for issuance of the amendment. Since no basis exists for this omission, BG&E requests that the isolation time values for Penetration 1A be included in the Table 3.6-1 to correctly reflect the Table values as originally requested.

17. Specification 4.6.5.1 (Units 1 & 2)

The original request for Amendment Nos. 109 and 92 for Units 1 and 2, respectively, called for the Surveillance Requirements for the Limiting Condition for Operation 3.6.5.1 to be numbered as 4.6.5.1 and 4.6.5.2. However, this numbering scheme causes confusion as the Surveillance Requirement for LCO 3.6.5.2 is also numbered 4.6.5.2. In other words, there are currently two Surveillance Requirements numbered 4.6.5.2. In order to eliminate possible confusion, BG&E requests that the Surveillance Requirements for LCO 3.6.5.1 be renumbered to 4.6.5.1.1 and 4.6.5.1.2.

18. Specification 3.7.1.1.a (Unit 1)

Unit 1 Technical Specification Action statement 3.7.1.1.a and the corresponding Unit 2 Technical Specification provide specific actions to be taken with main steam line code safety valves inoperable. Unit 2 Action statement 3.7.1.1.a concludes with "otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD

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5. Bases 2.1.2 (Unit 1)

Unit 1 Technical Specification Bases 2.1.2 currently states that the "entire RCS is hydrotested at 3215 psia." The correct pressure is 3125 psia. With the issuance of Amendment 130 (Unit 1) this number was transposed from 3125 psia to 3215 psia. Since that amendment request did not involve this area and no bases exists for this change in pressure, BG&E requests that the pressure be restored to show the correct pressure as it appeared prior to Amendment 130.

6.* Bases 2.1.2 (Units 1 & 2)

Technical Specification Bases 2.1.2 (Units 1 & 2) currently states that "The Reactor Coolant System piping, valves, and fittings are designed to ANSI B31.7, Class I, 1969 edition." The Reactor Coolant System piping, valves, and fittings are designed and built to the 1968 draft edition of this standard as referenced in CE Specification 8067-31-5 and CENC-1179. The bases have referenced the incorrect year since the Technical Specifications were originally approved. Since no basis exists for this discrepancy, BG&E requests that the reference year for this standard be changed to 1968.

7. Section 3/4.1.1.1 (Units 1 & 2)

Three references to Footnote * in the Limiting Condition for Operation and Surveillance Requirements for Technical Specification 3/4.1.1.1 were inadvertently omitted from the final pages which were issued with Amendment Nos. 130 and 123 for Units 1 and 2, respectively. The footnote remains on Technical Specification page 3/4 1-1 and continues to be applicable to the Technical Specification. Since no basis exists for the omission, BG&E requests that the Technical Specification 3/4.1.1.1 be corrected to reflect correct references to the footnote.

8. Specification 4.1.1.1.1 (Unit 1)

The word "line" in the first sentence of Surveillance Requirement 4.1.1.1.1 was inadvertently omitted in Amendment No. 130 for Unit 1. The word was included in the amendment request but was apparently not transferred to the final pages issued with the amendment. Since no basis exists for this omission, BG&E requests that the word "line" be placed in the Surveillance Requirement as originally requested.

9. Table 3.3-3 (Unit 2)

Unit 2 Technical Specification Table 3.3-3, item 9 and 9.a were not correctly transposed from the amendment request to the amendment. The amendment request changed the values within the table itself, however upon issuance of the amendment, the phrase "Actuation System" was not included in item 9 and the term "(Trip Buttons)" was not included on item 9.a. As there is no basis for the omission of these items from Table 3.3-3, BG&E requests that items 9 and 9.a be returned to their pre-amendment terminology. Additionally, the acronym "AFAS" should be included in the Unit 2 table to be consistent with Unit 1.

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ADMINISTRATIVE CORRECTIONS

SHUTDOWN within the next 30 hours." However, Unit 1 currently concludes this Action statement with "otherwise, be in at least HOT STANDBY within the following 30 hours." Research into the reason for this discrepancy found that prior to Amendment No. 104 (Unit 1) these two Action statements were similarly worded. Amendment No. 104 requested a change to this page but did not affect the Action statement of concern. The new page provided with the amendment omitted the phrase "next 6 hours and in COLD SHUTDOWN within the". This apparently was an error in transcription. Since no basis exists for the discrepancy, BG&E requests that Unit 1 Technical Specification Action statement 3.7.1.1.a be restored to its pre-Amendment No. 104 wording.

19. Section 3/4.7.8 (Unit 1)

The Action requirement for Technical Specification 3.7.8.1 references Specification 4.7.8.b and c. Specifications 4.7.8.b and c do not exist. Examination of the subjects involved clearly shows that the reference should be to Specifications 4.7.8.1.b and c. Similarly, Surveillance Requirements 4.7.8.1.b and c each contain reference to Specification 4.7.8.d, which should be 4.7.8.1.d. These identical changes were made to Calvert Cliffs Unit 2 Technical Specifications by Amendment No. 119 on March 24, 1989, included with substantive changes that were specific to Unit 2. Baltimore Gas and Electric Company requests that these references be corrected in the Unit 1 Technical Specifications.

20.* Specification 3.7.11.5 (Units 1 & 2)

Items 3.7.11.5.a and 3.7.11.5.b, now located under the Applicability statement of this Technical Specification, describe the yard fire hydrants and hydrant hose houses which are required to be operable. While the original submittal requested that these items be placed here, it is apparent that they should be placed before the Applicability statement. In order to eliminate any confusion as to which yard fire hydrants and hydrant hose houses are required to be operable, BG&E requests that Items 3.7.11.5.a and 3.7.11.5.b be placed before the Applicability statement.

21. Specification 4.9.12.c (Units 1 & 2)

Amendment Nos. 142 and 125 for Units 1 and 2, respectively, included changes involving in-place testing of HEPA filters and charcoal adsorbers. The testing reference was changed from ANSI N510-1975 to certain parts of Regulatory Guide 1.52 in many parts of the Technical Specifications. In the last paragraph of Specification 4.9.12.c, the Regulatory Guide number was inadvertently omitted for both units when final pages were prepared. Baltimore Gas and Electric Company requests that the Regulatory Guide number be added to Specification 4.9.12.c for each unit.

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22. Section 3/4.12.1 (Units 1 & 2)

The Limiting Condition for Operation title "3/4.12.: Monitoring Program" was omitted from the issuance of Amendment Nos. 105 and 86 for Units 1 and 2, respectively. The title was correctly listed on the amendment request but it was apparently not transferred with the pages provided for the issuance of the amendment. Since no basis exists for this omission, BG&E requests that the title be included to correctly refer to the Limiting Condition for Operation and to correspond with the Table of Contents.

23. Bases 3/4.2.2, 3/4.2.3, 3/4.2.4 (Unit 1)

The Bases section for Unit 1 Technical Specifications 3/4.2.2, 3/4.2.3, and 3/4.2.4 contains wording which has been inadvertently duplicated on succeeding pages. This wording had also been inaccurately transferred from page B3/4 2-2 to B3/4 2-1 in the past. The wording in question was correct when issued as Amendment No. 39. Amendment 104 resulted in this text being transferred from page B3/4 2-2 to B3/4 2-1. During the transfer, the word "not" was inadvertently inserted into the last paragraph of the current page B3/4 2-1. On September 29, 1989, unrelated changes were requested to page B3/4 2-2. These Unit 1 changes were inappropriately identified in that a Unit 2 page was marked up. The Unit 2 page still contained the wording in question. The Unit 1 Bases revision was subsequently issued resulting in the wording in question being re-inserted on Unit 1 page B3/4 2-2. The discrepancy was identified at that time. Since no basis exists for this discrepancy, BG&E requests that the Technical Specification Bases be corrected to delete the duplicated text and reflect the pre-Amendment No. 104 wording.

24. Bases 3/4.7.1.6 (Units 1 & 2)

The Amendment Request, dated July 30, 1981, for Amendment Nos. 59 and 41, Units 1 and 2, respectively, requested the deletion of the Limiting Condition for Operation 3.7.1.6 and the Surveillance Requirement 4.7.1.6. However, it neglected to request deletion of the corresponding Bases. Since Limiting Condition for Operation 3.7.1.6 and Surveillance Requirement 4.7.1.6 have been deleted and there is no longer the need for Bases 3/4.7.1.6, BG&E requests that this Bases section be deleted from the Technical Specifications.

25. Specification 6.4.1 (Units 1 and 2)

Specification 6.4.1 contains a reference to Appendix "A" of 10 CFR Part 55. Appendix "A" of 10 CFR Part 55 has been changed to 10 CFR 55.59(c), as indicated in paragraph (H)(i) of Federal Register notice 52FR9459. Baltimore Gas and Electric Company requests that Specification 6.4.1 be changed accordingly for both units.

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26.* Specification 6.4.2 (Units 1 & 2)

Specification 6.4.2 states that a training program for the Fire Brigade is maintained under the direction of the Supervisor-Planning and Support. The actual person responsible for this program is the Manager-Nuclear Safety and Planning Department. Baltimore Gas and Electric Company requests that Specification 6.4.2 be changed to reflect the appropriate person responsible for this item.

27. Specification 6.5.4.2 (Unit 2)

Amendment Nos. 43 and 26 for Units 1 and 2, respectively, called for changes to the composition of OSSRC. The entire change was incorporated into the Unit 1 Technical Specification 6.5.4.2. However, a portion of the change ("and shall collectively have expertise in all areas of 6.5.4.1") was not incorporated into the Unit 2 Technical Specification. As no basis exists for this discrepancy, BG&E requests that the missing phrase be included in 6.5.4.2 of Unit 2.

28. Specification 6.10.2 (Units 1 & 2)

Amendment Nos. 108 and 91 for Units 1 and 2, respectively, deleted Section 6.13 "Environmental Qualification". Section 6.13 contained schedule requirements for completion of activities involving the environmental qualification of electrical equipment important to safety that had already passed. Moreover, environmental qualification requirements had been incorporated in 10 CFR 50.49 and thus did not need to appear in the Technical Specifications. The amendment request neglected to request the deletion of 6.10.2, Item 1, which is also related to environmental qualification and which references paragraph 6.13. The current paragraph 6.13 now contains information regarding "System Integrity". This is obviously referenced incorrectly as "Environmental Qualification" through 6.10.2, Item 1. Since 10 CFR 50.49(j) duplicates and supersedes this Technical Specification, and to eliminate the discrepancy caused by 6.10.2, Item 1, BG&E requests that 6.10.2, Item 1 be deleted.

December 10, 1991

ATTACHMENT (3)**THIRD PARTY CERTIFICATION LETTER**

Mr. G.C. Creel
 Vice President-Nuclear Engineering Division
 Baltimore Gas and Electric Company
 Calvert Cliffs Nuclear Power Plant
 Routes 2 & 4, P.O. Box 1536
 Lusby, MD 20657

Dear Mr. Creel:

The Technical Specifications for Units 1 and 2 at Calvert Cliffs Nuclear Power Plant have been checked for accuracy against the BG&E supplied marked up Technical Specifications and are certified to be an accurate retyping. The process by which the documents were generated is described below.

I. Independent Parallel Text Entry

These documents were produced by two independent teams of word processors and editors working in parallel. Using the hardcopy originals provided by BG&E as a basis, and incorporating the BG&E approved format guide, the word processors retyped the text. The editors proofed the generated text against the original, again using the format guide for product consistency. If any corrections were necessary, the text was marked up and returned to the word processor, then the editor. This cycle continued until the documents were complete.

II. Electronic File Comparison

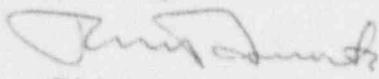
The finished products were then electronically stripped of formatting codes, headers, and footers to allow the files to be electronically compared and discrepancies identified. This method removes the human error factor as much as possible. Although we found no major discrepancies, minor corrections were made after this phase to bring the two products into complete alignment.

III. Senior Engineering Comparison

Though the likelihood of textual error was almost non-existent at this point, we still added an additional safeguard. A senior engineer familiar with CE plants compared the finished product against an original of the Technical Specifications provided by BG&E. His comparison focused primarily on the verification of numerical values, but he also identified questions for review in the original specification data.

The amendments were incorporated after the above process was complete; they went through an edit cycle of their own. The new Technical Specifications were marked up to reflect the changes and the changes were entered. The output was proofed against both the markup and the original amendment request. MEREX certifies that the product generated through this strenuous process is an accurate recreation of the Technical Specifications received from BG&E. It has been a pleasure working with you on this project; we look forward to working with you in the future.

Sincerely,



Richard M. Tworek
 Managing Director

Sworn to and subscribed before me
 this 10th day of Dec, 1991.

Witness my hand and official seal.

Judith R. Marmelstein
My Commission Expires Jan 5 1994