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August 31, 1995

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
Independent Spent Fuel Storage Installation Docket No. 72-8
Revision to Emergency Response Plan Implementing Procedure 905

The purpose of this letter is to inform you that we plan to implement the changes listed in Attachment 1. We have determined that these changes do not decrease the effectiveness of the Calvert Cliffs Emergency Response Plan. The Plan, as changed, will continue to meet 10 CFR 50.47(b) and 10 CFR Part 50, Appendix E.

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

Very truly yours,

RED/TWG/dlm

Attachment

cc: D. A. Brune, Esquire
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ATTACHMENT (1)

ERPIP-905, Exercises, Tests and Drills Revision 1

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New wording is bolded; deleted words are lined through.

Change No. 1 (Mobilization Of State . . .)

Emergency Response Plan Implementing Procedure (ERPIP)-905, Item 2.B

Description: "In State participation exercises, provisions shall be made ~~in exercises~~ to facilitate mobilization of State . . . (i.e., a State participation exercise may . . .)."

Justification:

ERPIP 905, revision 1 satisfies NUREG-0654 guidance because it requires exercises to facilitate State mobilization whenever the State participates in an exercise.

Change No. 2 (Six-Year Period Objectives Demonstration)

ERPIP-905, Item 2.C.

Description: "Exercise scenarios shall be varied . . . such that all major elements . . . are tested within a ~~five~~ six year period."

References:* FEMA-REP-14, "Radiological Emergency Preparedness Exercise Manual," September 1991.

NRC Inspection Manual Inspection Procedure 82302, "Review Of Exercise Objectives and Scenarios For Power Reactors," March 18, 1994.

Change No. 3 (Off-Hours Exercise)

ERPIP-905, Item 2.E.

Description: "Provisions shall be made to start an exercise between 6:00pm and ~~midnight and another~~ ~~between midnight and 6:00~~ 4:00am once every six years."

References:* Same as Change No. 2.

* References used to justify the change. The change is consistent with the language used in the references.

ATTACHMENT (1)

ERPIP-905, Exercises, Tests and Drills Revision 1

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Change No. 4 (Drill Frequency For Post Accident Sampling)

ERPIP-905, Item 3.F.(2)

Description: Health Physics drills: ~~ANNUALLY~~ BIENNIALY. Shall involve analysis of inplant liquid samples with actual elevated radiation levels including use of ~~the~~ post-accident sampling ~~system~~ procedures.

Justification:

Post-Accident Sampling System use and personnel experience gained under the site training and surveillance test programs along with a biennial drill maintains an adequate training level with regard to analysis of inplant liquid samples. System users (Chemistry Technicians) receive formal post-accident sampling training on an annual basis. As described in Chemistry Training Lesson Plan C-217-311, "Principals of Operations for H₂ Analyzer and WRGM," this training involves classroom sessions and field work. Post-accident sampling proficiencies are maintained and system operability is assured by weekly, monthly and quarterly system use in accordance with CP-802-1, "Post-Accident Sampling Surveillance Test Procedure," and CP-803, "Post-Accident Gaseous Sampling System Test Procedure." Post-accident sampling experience provided by Emergency Response Plan drills represents a small portion of the total training experience. Changing the drill sampling frequency facilitates exercise of more realistic scenarios in biennial drills. Therefore, a biennial frequency for post-accident sampling activities is acceptable.