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February 21, 1992

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 1; Docket Nos. 50-317
Request for Regional Waiver of Compliance

REFERENCE: (a) Letter from Mr. G. C. Creel (BG&E) to Document Control Desk (NRC), "Temporary Non-Code Repair of ASME Code Class 3 Piping," dated November 27, 1991

Gentlemen:

Baltimore Gas & Electric Company (BG&E) hereby requests a temporary waiver of compliance from Technical Specification 3.7.10, "Watertight Doors", in order to permit a repair to the Saltwater System without a plant shutdown. We believe that this is the safest course of action because it would avoid an unnecessary thermal transient associated with a plant shutdown. Performing the repair during operation does not present any significant safety concerns.

REQUIREMENT FOR WHICH A WAIVER IS REQUESTED

Technical Specification 3.7.10, "Watertight Doors", states that the listed watertight doors are to be closed except when the door is being used for normal entry and exit. Item b is "Service Water Pump Room to Heater Bay Doors (2)." If the specified doors are not closed within 24 hours, the plant is to be in Hot Standby within 6 hours.

There are two watertight doors between the Service Water Pump Room and the Turbine Building: a double equipment door and a single personnel door. In order to drain the saltwater header and perform the repair, it is necessary to run various lines and cables through the equipment door (Door 214), thereby violating the condition that it be closed "except when the door is being used for normal entry and exit."

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CIRCUMSTANCES SURROUNDING THE NEED FOR A WAIVER

On February 20, 1992 at 12:25 p.m., BG&E declared the Unit 1 No. 11 Saltwater header inoperable due to a through-wall leak. This placed the plant in a 72 hour action statement leading to plant shutdown (Technical Specification 3.7.5.1). It is necessary to drain a portion of the No. 11 header in order to perform an ASME Code-compliant repair to the Saltwater header. The system will be drained into the Service Water Pump Room and sump pumps will be used to transfer the drained water to the Turbine Building sump. Additionally, it is necessary to run various electrical and pneumatic lines and cables through the door. Since the repair cannot be performed without having the door open, which requires the requested waiver, prompt action is required.

This circumstance could not have been foreseen. In November, 1991, BG&E identified a small leak from the No. 11 saltwater header and obtained permission to perform a temporary non-Code repair (Reference A). At that time we committed to examine the leak in three months and confirm that our analysis is still valid. Upon examination of the leak, we determined that the leak site had enlarged and no longer fell within our original analysis. A decision was made to perform a Code-compliant repair of the leak. When the original examination and analysis was performed, we believed that the leak site would not substantially degrade prior to its repair in the next refueling outage, scheduled for March, 1992.

COMPENSATORY ACTIONS

We will post a watch at the watertight door at all times that it is open and lines are placed through the door. Should a flooding event occur in the Service Water Pump Room or in the Turbine Building, the watch will disconnect the lines and cables and close the door. A review of our internal flooding studies has confirmed that there will be sufficient time to disconnect the lines and cables and close the door should the worst-case flooding event occur.

SAFETY SIGNIFICANCE/POTENTIAL CONSEQUENCES

The consequences of a worst-case pipe failure in the Turbine Building with the watertight door open would be the flooding of the Service Water Pump Room. This would result in all Service Water Pumps and the motor-driven Auxiliary Feedwater Pump being rendered inoperable.

Previously performed analyses have shown that, should a worst-case flooding event occur, there will be sufficient time (greater than 10 minutes) for the posted watch to disconnect the lines and cables and close the door.

DURATION OF THE WAIVER

We request that the waiver be granted until 12:25 p.m. on February 23, 1992. If the repair is not performed and the No. 11 saltwater header returned to service by that time, Technical Specification 3.7.5.1, "Saltwater System", requires that the plant be in Hot Standby within 6 hours. In order to perform the repair, it is necessary to run various lines and cables through the door. Therefore, we request that the duration of the waiver encompass the maximum repair time (i.e., the 72-hour action statement for the Saltwater System).

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed waiver has been evaluated against the standards in 10 CFR Part 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed waiver:

1. *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

   The watertight door is not an initiator to any previously evaluated accident. Therefore, the requested waiver will not increase the probability of any accident previously evaluated.

   The only previously evaluated accident which requires that the watertight door be closed is a flooding event. Should a worst-case flooding event occur, sufficient time will exist before the water level reaches the bottom of the door for the posted watch to disconnect the lines and cables and close the door. Therefore, there is no increase in the consequences of any previously analyzed accident.

2. *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

   This waiver will not result in any physical changes to the plant or any new or significantly different type of operations from those routinely performed. Therefore, it will not create the possibility of a new or different type of accident from any accident previously evaluated.

3. *Would not involve a significant reduction in a margin of safety.*

   The margin of safety provided by the watertight door is to ensure the protection of safety related equipment from the effects of water escaping from ruptured pipes or components in adjoining rooms. Previous analysis has shown that should such a rupture occur, there is sufficient time to close the watertight door prior to any safety related equipment being affected. Therefore, the requested waiver does not involve a reduction in a margin of safety.

ENVIRONMENTAL CONSEQUENCES

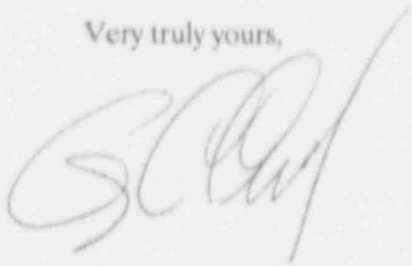
The granting of the requested waiver will not result in the release of any radioactive or chemical materials to the environment. Neither will the granting of the requested waiver change the operation of or limitations on radioactive or chemical waste processing systems. Therefore, the granting of the requested waiver has no environmental consequences.

SAFETY COMMITTEE REVIEW

This proposed waiver of Technical Specification 3.7.10 and our discussion of significant hazards considerations have been reviewed by our Plant Operations and Safety Review Committee. They concur that utilization of this waiver will not result in an undue risk to the health and safety of the public.

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

Very truly yours,



GCC/BDM/bdm/bjd/dlm

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