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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

October 11, 1984

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Mr. James R. Miller, Chief
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2, Docket Nos. 50-317 & 50-318
Request for Amendment

REFERENCES: (a) Letter from A. E. Lundvall, Jr., to J. R. Miller of September 14,
1984 (Request for Exemption)

(b) Letter from J. R. Miller to A. E. Lundvall, Jr., of August 30, 1984
(Relief from ASME Code Requirements Section XI Determined to
be Impractical)

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its
Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 & 2,
respectively, with the submittal of the enclosed change to the Technical Specifications.

PROPOSED CHANGE (BG&E FCR 84-112)

Remove existing pages 3/4 6-2 of the Unit Nos. 1 and 2 Technical Specifications and
replace with marked-up pages attached to this transmittal.

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DISCUSSION

This change is being processed to complete the action requested by reference (a). We requested an exemption to 10 CFR 50 Appendix "J" requirements, which would allow BG&E to perform the Integrated Leak Rate (Type "A") Test during the next scheduled refueling outage, instead of the revised 10 year ISI dates approved by reference (b).

Without the exemption from Appendix "J" and this proposed Technical Specification change, we would be unable to meet the 40 ± 10 month interval currently required by our Technical Specifications. We feel the intent of the Type "A" testing requirements is met by the 40 ± 10 month requirement. In addition, the 10 year ISI outage activity does not specifically alter containment integrity, as stated in reference (a).

Removing the requirement to conduct the third Type "A" Test during the 10 year inservice inspection shutdown will not significantly affect the overall assessment of the containment integrity or leakage. Since only the interval is changed, the Type A test will continue to provide a realistic assessment of the end-of-cycle leakage.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

Because the Type "A" test will continue to meet its intent, the probability or consequences of an accident previously analyzed will not be affected by this proposed change. No new accidents of a different type from those accidents previously evaluated will be created. In addition, because the 40 ± 10 month interval will be maintained, no significant reduction in the margin of safety will occur. Therefore, based upon the above, this proposed amendment has been determined to involve no significant hazards considerations.

SAFETY COMMITTEE REVIEW

This proposed change to the Technical Specifications and our determination of significant hazards have been reviewed by the Plant Operations and Offsite Safety Review Committees, and they have concluded that implementation of this change will not result in an undue risk to the health and safety of the public.

