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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

October 12, 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

SUBJECT: Calvert Cliffs Nuclear Power Plant

Unit Nos. 1 & 2, Docket Nos. 50-317 & 50-318

Diesel Generator Reliability

REFERENCES: (a) Letter from Mr. A.E. Lundvall, Jr. to Mr. Darrell G. Eisenhut dated February 29, 1984.

- (b) Letter from Mr. A.E. Lundvall, Jr. to Mr. Darrell G. Eisenhut dated March 20, 1984.
- (c) NRC Generic Letter 84-15, "Proposed Staff Actions to Improve And Maintain Diesel Generator Reliability".

Gentlemen:

The enclosed request for amendment to the Calvert Cliffs Technical Specifications is being forwarded on behalf of previous commitments we have made in correspondence to the Director, Division of Licensing. These proposed amendments are focused on improving the reliability of the emergency diesel generators installed at our facility by modifying certain Technical Specifications that we perceive to degrade safety. Although we are unaware of any specific requirements that have been issued by the Commission, recent investigations in the industry strongly suggest that improvements in this area are warranted. We believe that improvements in this area are beneficial and could have a strong influence on the proposed rulemaking for Task Action Plan (TAP) A-44, Station Blackout. Considering the alternatives for resolving the issues associated with TAP A-44 that confront the rulemaking task force, we believe that reducing the number of fast cold starts and improvements in maintenance on the diesel generators offers the greatest potential for resolving safety questions and provides the most cost beneficial means to the industry for resolving these issues.

In Reference (a), we committed to performing a review of certain Technical Specifications to identify and correct deficiencies that we perceived to degrade (rather than enhance) safety with regard to surveillance testing of safety-related equipment. In

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Reference (b) we reaffirmed our previous commitment per Reference (a) above, while responding to a voluntary request for information and providing an evaluation of the effects of fast cold starts on diesel generator reliability for Generic Letter 83-41. The proposed amendments, provided in the attached request for changes to our Technical Specifications, respond in part to item 3.2.3 of Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", and suggestions originating in Reference (c).

Should you have any questions on the matter, please contact us.

Very truly yours,

AEL/LOW/ms

cc: D. A. Brune, Esquire

G. F. Trowbridge, Esquire

D. H. Jaffe, NRC

T. E. Foley, NRC

T. Magette, DNR