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Nuclear Energy

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Calvert Cliffs Nuclear Power Plant
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December 7, 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
License Amendment Request: Add the Convolution Analytical Technique to the
Technical Specifications

- REFERENCES:
- (a) Letter from Mr. R. E. Denton (BGE), to NRC Document Control Desk, dated November 1, 1994, Request for Approval to Use Convolution Technique in Main Steam Line Break Analysis
 - (b) Letter from Mr. D. G. McDonald, Jr. (NRC), to Mr. R. E. Denton (BGE), dated May 11, 1995, Approval to Use Convolution Technique in Main Steam Line Break Analysis - Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (TAC Nos. M90897 and M90898)

Pursuant to 10 CFR 50.90, the Baltimore Gas and Electric Company (BGE) hereby requests an amendment to Operating Licenses Number DPR-53 and DPR-69 to add an analysis technique to the list of approved core operating limits analytical methods in the Technical Specifications for Calvert Cliffs Units 1 and 2. In Reference (a), BGE requested NRC approval to use the convolution technique for determining the values in the Core Operating Limits Report related to the pre-trip main steam line break event. The NRC approved the use in a Safety Evaluation attached to Reference (b). This amendment would add the convolution technique to the list of approved methodologies in Technical Specification 6.9.1.9.b. As noted above, the convolution technique is already approved, therefore this change is not technical in nature.

The proposed change to Section 6.9.1.9.b is shown in Attachments (2) and (3). The final Technical Specification pages will be renumbered to accommodate the insertion of this change. The same change will be made in the Core Operating Limits Report using the 10 CFR 50.59 process.

We have considered the possibility of significant hazards associated with this change and have determined that there are none (see Attachment 1 for a complete discussion). We have also determined that operation with the proposed amendment would not result in any significant change in the types or amounts of any

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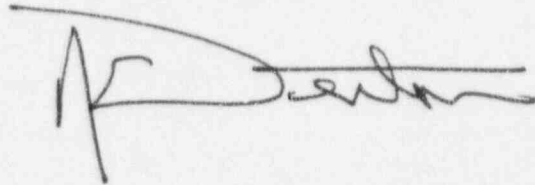
effluents that may be released offsite, nor would it result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the proposed amendment.

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

This change is requested to be approved by May 15, 1996. No operation of the facility is dependent on approval.

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

Very truly yours,



STATE OF MARYLAND :
: TO WIT:
COUNTY OF CALVERT :

I hereby certify that on the 7th day of December, 1995, before me, the subscriber, a Notary Public of the State of Maryland in and for Calvert County, personally appeared Robert E. Denton, being duly sworn, and states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements made are true and correct to the best of his knowledge, information, and belief; and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal: Denise D. Snukis
Notary Public

My Commission Expires: 2/2/98
Date

- RED/EMT/dlm
- Attachments: (1) Determination of Significant Hazards
(2) Marked-up Technical Specification Page - Unit 1
(3) Marked-up Technical Specification Page - Unit 2

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cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
L. B. Marsh, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
Resident Inspector, NRC
R. I. McLean, DNR
J. H. Walter, PSC

ATTACHMENT (1)

DETERMINATION OF SIGNIFICANT HAZARDS

ATTACHMENT (1)

DETERMINATION OF SIGNIFICANT HAZARDS

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

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

The proposed change is to add the convolution analysis technique previously approved by the NRC to the list of approved methodologies in Calvert Cliffs' Unit 1 and 2 Technical Specifications. By letter dated November 1, 1994, Baltimore Gas and Electric Company (BGE) requested approval to use the ABB/Combustion Engineering (ABB/CE) convolution technique for determining the values in the Calvert Cliffs Core Operating Limits Report (COLR) related to the pre-trip main steam line break event. Approval was given by the NRC in their letter dated May 11, 1995. The addition of this technique to the list of approved analytical methods in Technical Specification 6.9.1.9.b is simply intended to identify it as an approved methodology. Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change is to add the convolution analysis technique previously approved by the NRC to the list of approved methodologies in Calvert Cliffs' Unit 1 and 2 Technical Specifications. By letter dated November 1, 1994, BGE requested approval to use the ABB/CE convolution technique for determining the values in the Calvert Cliffs COLR related to the pre-trip main steam line break event. Approval was given by the NRC in their letter dated May 11, 1995. The addition of this technique to the list of approved analytical methods in Technical Specification 6.9.1.9.b is simply intended to identify it as an approved methodology. Therefore, the change would 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 the margin of safety.*

The proposed change is to add the convolution analysis technique previously approved by the NRC to the list of approved methodologies in Calvert Cliffs' Unit 1 and 2 Technical Specifications. By letter dated November 1, 1994, BGE requested approval to use the ABB/CE convolution technique for determining the values in the Calvert Cliffs COLR related to the pre-trip main steam line break event. Approval was given by the NRC in their letter dated May 11, 1995. The addition of this technique to the list of approved analytical methods in Technical Specification 6.9.1.9.b is simply intended to identify it as an approved methodology. Therefore, operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

ATTACHMENT (2)

MARKED-UP TECHNICAL SPECIFICATION PAGE

UNIT 1

6-22