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VICE PRESIDENT
SUPPLY

September 20, 1984

CERTIFIED MAIL

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
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) I&E Inspection Report 50-317/83-35; 50-318/83-35

(b) Letter from Mr. A. E. Lundvall, Jr., to Mr. T. T. Martin dated
June 29, 1984, Radiological Dose Assessment Capability During
Emergencies

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 proposed change to the Technical Specifications.

CHANGE (BG&E FCR 84-110)

Remove existing pages 3/4 3-35, 3/4 3-36, B 3/4 3-2, and 5-2 of the Unit Nos. 1 and 2 Technical Specifications and replace with attached marked up pages.

DISCUSSION

This proposed change to the Technical Specifications is being processed in response to reference (a), Open Item 83-35-06, concerning incorporation of new meteorological instrumentation into the Technical Specifications.

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This proposed change requests incorporation of a new meteorological system that will provide the essential parameters used in support of dose assessment calculations for emergency preparedness. The new meteorological tower and associated instruments were installed to correct instrument exposure problems identified with the older instruments and tower, improve instrument accuracy and provide wind measurements at the 10 meter elevation to conform to Regulatory Guide 1.23-Rev. 1 and NUREG's 0654 and 0737. The new meteorological system represents a marked improvement over the old system. The new system will be considered the "primary" meteorological system as addressed in Regulatory Guide 1.23-Rev. 1.

A description of the meteorological instrument channels proposed to be added to the operability requirements is as follows:

- wind speed at elevations of 10 meters and 60 meters to replace old wind speed at 125 feet and 200 feet respectively;
- wind direction at elevations of 10 meters and 60 meters to replace old wind direction at 125 feet and 200 feet respectively; and,
- differential temperature between 10 and 60 meters to replace old differential temperature between 30 and 200 feet

In addition, it is proposed to delete the operability requirement for the differential temperature measurement channel between 30 and 125 feet as this measurement provides no additional useful information and is not specified by regulatory guidance. Operating experience has shown that daily channel checks and semi-annual calibrations are adequate to ensure that the equipment provides the minimum data availability required by regulatory guidance for these instruments. It is also proposed to show the location of the new tower and delete the labeling of the old tower on Figure 5.1-1 in the Design Features section of the Technical Specifications.

The new tower and associated instruments substantially conform to and meet the intent of guidance provided in NUREG 0654 and Regulatory Guide 1.23-Rev. 1 concerning the primary meteorological system. In two cases the design of the new tower and system differ from the literal statements in Regulatory Guide 1.23-Rev. 1. However, in both cases the intent of the Regulatory Guide is met. The Regulatory Guide states that, whenever possible, the base of the primary tower should be at the same elevation as plant grade so that the upper sensor set at 60 meters corresponds to the effluent release point at the plant vent. The base of the new tower is 65 feet (approximately 20 meters) above plant grade. However, the intent of the regulatory guidance is met in that, especially during low wind (laminar flow) conditions which are conservative, the upper sensors on the new tower measure conditions indicative of the conditions at the plant vent. Regulatory Guide 1.23-Rev. 1 also requires that meteorological parameters from the primary tower be displayed in the control room, reference (a) item 83-35-05 refers. The new system utilizes a dose assessment computer terminal in lieu of strip chart recorders in the control room. The operator can call up either 10 second data in real

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time or 15 minute averaged data and obtain hard copy if desired. The intent of the regulatory guidance is met in that information from the primary instruments is readily available through a series of simple commands. These concerns are addressed in more detail in enclosure (1) of reference (b).

The possibility of the continued use of the old meteorological instruments as the "back up" system as addressed in Regulatory Guide 1.23-Rev. 1 and the use of strip chart recorders or other continuous display devices in the control room for the primary instruments is currently being evaluated.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

This proposed change to the Technical Specifications has been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed license amendment would not:

- (i) involve any significant increase in the probability or consequences of an accident previously evaluated; or
- (ii) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (iii) involve any reduction in the margin of safety.

In fact, since the new meteorological instruments are more accurate and better located, this proposed change should result in an improvement to the margin of safety.

SAFETY REVIEW COMMITTEE

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

