

#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

#### BALTIMORE GAS AND ELECTRIC COMPANY

#### DOCKET NO. 50-317

#### CALVERT CLIFFS NUCLEAR POWER PLANT UNIT NO. 1

#### AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 212 License No. DPR-53

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Baltimore Gas and Electric Company (the licensee) dated January 16, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter 1:
  - B. The facility will operate in conformity with the application. the provisions of the Act, and the rules and regulations of the Commission:
  - There is reasonable assurance (i) that the activities authorized C. by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - The issuance of this amendment will not be inimical to the common D. defense and security or to the health and safety of the public; and
  - The issuance of this amendment is in accordance with 10 CFR Part Ε. 51 of the Commission's regulations and all applicable requirements have been satisfied.
- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment. and paragraph 2.C.2. of Facility Operating License No. DPR-53 is hereby amended to read as follows:

9603270145 96031 PDR ADOCK 05000317 PDR

## 2. <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 212, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Al Ledyard B. Marsh, Director Project Directorate I-1 Division of Reactor Projects - i/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 13, 1996



UNITED STATES NUCLEAR REGULATORY COMMISSION

#### BALTIMORE GAS AND ELECTRIC COMPANY

#### DOCKET NO. 50-318

#### CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 2

#### AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 189 License No. DPR-69

- 1. The Nuclear Regulatory Commission (the Commission) has found inat:
  - A. The application for amendment by Baltimore Gas and Electric Company (the licensee) dated January 6, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without e.dangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.2. of Facility Operating License No. DPR-69 is hereby amended to read as follows:

## 2. <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 189, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

 This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Ledyard B. Marsh, Director Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation.

Attachment: Changes to the Technical Specifications

Date of Issuance: March 13, 1996

# ATTACHMENT TO LICENSE AMENDMENTS AMENDMENT NO. 212 FACILITY OPERATING LICENSE NO. DPR-53 AMENDMENT NO. 189 FACILITY OPERATING LICENSE NO. DPR-69

DOCKET NOS. 50-317 AND 50-318

Revise Appendix A as follows:

**Remove Pages** Insert Pages 3/4 6-2 3/4 6-2 3/4 6-3 3/4 6-3 3/4 6-4 3/4 6-5 through 3/4 6-10 3/4 6-4 through 3/4 6-9\* 3/4 6-11 3/4 6-10 3/4 6-12 through 3/4 6-29 3/4 6-11 through 3/4 6-28\* 6-31 6-31 6-32 B 3/4 6-1 B 3/4 6-1 B 3/4 6-2 B 3/4 6-2 **Remove** Pages Insert Pages 3/4 6-2 3/4 6-2 3/4 6-3 3/4 6-3 3/4 6-4 3/4 6-5 through 3/4 6-9 3/4 6-4 through 3/4 6-8\* 3/4 6-10 3/4 6-9 3/4 6-11 through 3/4 6-25 3/4 6-10 through 3/4 6-24\* 6-32 B 3/4 6-1 B 3/4 6-1 B 3/4 6-2 B 3/4 6-2

\*Indicates rollover pages.

#### 3/4.6.1 PRIMARY CONTAINMENT

Containment Leakage

## LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

- a. A maximum allowable containment leakage rate, L,, as specified in Specification 6.19, "Containment Leakage Rate Testing Program."
- b. A combined leakage rate of  $\leq 0.50$  L (173,000 SCCM), for all penetrations and valves subject to Type B and C tests when pressurized to P ...

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION: With either (a) the measured overall integrated containment leakage rate exceeding the acceptance criteria specified in the Containment Leakage Rate Testing Program, or (b) with the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding 0.50 L, restore the overall integrated containment leakage rate to within the acceptance criteria specified in the Containment Leakage Rate Testing Program, and the combined leakage rate for all penetrations and valves subject to Type B and C tests to less than or equal to 0.50 L, prior to increasing the Reactor Coolant System temperature above 200°F.

#### SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria, methods and provisions specified in 10 CFR Part 50, Appendix J:

a. Perform required visual examinations and Type A testing in accordance with the Containment Leakage Rate Testing Program.

## SURVEILLANCE REQUIREMENTS (Continued)

- b. Type B and C tests shall be conducted with gas at P, (50 psig) at intervals of 24 months except for tests involving air locks.
- c. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.1.3.
- d. All Type B and C test leakage rates shall be calculated using observed data converted to absolute values.
- e. Containment purge isolation valves shall be demonstrated OPERABLE any time upon entering MODE 5 from power operation modes, unless the last surveillance test has been performed within the past six months or any time after being opened and prior to entering MODE 4 from shutdown modes by verifying that when the measured leakage rate is added to the leakage rates determined pursuant to Technical Specification 4.6.1.2.b for all other Type B or C penetrations, the combined leakage rate is less than or equal to 0.50 L (173,000 SCCM). The leakage rate for the containment purge isolation valves shall also be compared to the previously measured leakage rate to detect excessive valve degradation.
- f. The containment purge isolation valve seals shall be replaced with new seals at a frequency to ensure no individual seal remains in service greater than 2 consecutive fuel reload cycles.

Exemption to 10 CFR Part 50, Appendix J.

CALVERT CLIFFS - UNIT 1 3/4 6-3

#### 3/4.6.1 PRIMARY CONTAINMENT

#### Containment Air Locks

#### LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

- a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and
- b. An overall air lock leakage rate of < 0.05 L, (17,300 SCCM) at P., 50 psig.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With an air lock inoperable, except as a result of an inoperable door gasket, restore the air lock to OPERABLE status within 24 hours or be in at least NOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With an air lock inoperable due to an inoperable door gasket:
  - 1. Maintain the remaining door of the affected air lock closed and sealed, and
  - 2. Restore the air lock to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

- 4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:
  - a. After each opening, except when the air lock is being used for multiple entries, then at least once per 72 hours by verifying that the seal leakage is <  $0.0002 L_{o}$  (69.2 SCCM) as determined by precision flow measurement when the volume between the door seals is pressurized to a constant pressure of 15 psig,

Exemption to 10 CFR Part 50, Appendix J.

## SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 6 months by conducting an overall air lock leakage test at P. (50 psig) and by verifying that the overall air lock leakage rate is within its limit, and
- c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

## 3/4.6.1 PRIMARY CONTAINMENT

Internal Pressure

### LIMITING CONDITION FOR OPERATION

3.6.1.4 Primary containment internal pressure shall be maintained between -1.0 and 1.8 psig.

APPLICABILITY: MODES 1, 2, 3 and 4.

<u>ACTION</u>: With the ontainment internal pressure outside of the limits above, restore the internal pressure to within the limits within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.1.4 The primary containment internal pressure shall be determined to be within the limits at least once per 12 hours.

#### 3/4.6.1 PRIMARY CONTAINMENT

Air Temperature

#### LIMITING CONDITION FOR OPERATION

3.6.1.5 Primary containment average air temperature shall not exceed 120°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION: With the containment average air temperature > 120°F, reduce the average air temperature to within the limit within 8 hours, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

## SURVEILLANCE REQUIREMENTS

4.6.1.5 The primary containment average air temperature shall be the arithmetical average of the temperatures at the following locations and shall be determined at least once per 24 hours:

#### Location

- Containment Dome . 5
- b. Containment Reactor Cavity

#### 3/4.6.1 PRIMARY CONTAINMENT

Containment Structural Integrity

### LIMITING CONDITION FOR OPERATION

3.6.1.6 The structural integrity of the containment shall be maintained at a level consistent with the acceptance criteria in Specification 4.6.1.6.

APPLICABILITY: MODES 1, 2, 3 and 4.

## ACTION:

- a. With the containment structure exhibiting evidence of possible abnormal degradation per Specification 4.6.1.6.1. perform an engineering evaluation demonstrating the ability of the containment structure to continue to perform its design function. If continued containment integrity cannot be assured by engineering evaluation within 90 days of the surveillance test. be in COLD SHUTDOWN within 36 hours. The requirements of Specification 3.0.4 are not applicable.
- b. With the structural integrity of the containment not conforming at a level consistent with the acceptance criteria of Specification 4.6.1.6.2 or 4.6.1.6.3, restore structural integrity or complete an engineering evaluation that assures structural integrity prior to increasing Reactor Coolant System Temperature above 200°F.

### SURVEILLANCE REQUIREMENTS

4.6.1.6.1 Containment Tendons. The containment tendons' structural integrity shall be demonstrated at five year intervals. The tendons' structural integrity shall be demonstrated by:

a. Determining that for a representative sample of at least 9 tendons (3 dome, 3 vertical, and 3 hoop), each tendon has a norma'ized lift-off force equalling or exceeding its lower limit expected range for the time of the test (see Figures 3.6.1-1. 3.6.1-22, and 3.6.1-3). If the normalized lift-off force of any one tendon in a group lies between the lower limit expected range and the lower bound individual, an adjacent tendon on each side shall be checked for lift-off force. If both of these tendons are found acceptable, the surveillance program may proceed considering the single deficiency as unique and acceptable. If either of the

CALVERT CLIFFS - UNIT 1 3/4 6-8

Amendment No. 212

## SURVEILLANCE REQUIREMENTS (Continued)

adjacent tendons is found unacceptable, it shall be considered as evidence of possible abnormal degradation of the containment structure. In addition, more than one unacceptable tendon out of those selected for surveillance (from all three tendon groups) shall be considered as evidence of possible abnormal degradation of the containment structure.

If the normalized lift-off force of any single tendon lies below the lower bound individual, the occurrence should be considered as evidence of possible abnormal degradation of the containment structure.

In addition, determining that the average of the normalized liftoff forces for each sample population (hoop, vertical, dome) is equal to or greater than the required average prestress level; 536 kips for hoop tendons, 622 kips for vertical tendons, and 555 kips for dome tendons (reference Figures 3.6.1-1, 3.6.1-2, and 3.6.1-3). If the average is below the required average prestress force, it shall be considered as evidence of possible abnormal degradation of the containment structure.

- b. Removing one wire from each of a dome, vertical and hoop tendon checked for lift-off force, and determining over the entire length of the wire:
  - The extent of corrosion, cracks, or other damage. The presence of abnormal corrosion, cracks, or other damage shall be considered evidence of possible abnormal degradation of the containment structure.
  - 2. A minimum tensile strength value of 240 Ksi (guaranteed ultimate strength of the tendon material) for at least three wire samples (one from each end and one at mid-length) cut from each removed wire. Failure of any one of the wire samples to meet the minimum tensile strength test is evidence of possible abnormal degradation of the containment structure.
- c. Perform a chemical analysis to detect changes in the chemical properties of the sheath filler grease. Any unusual changes in physical appearance or chemical properties that could adversely affect the ability of the filler grease to adhere to the tendon wires or otherwise inhibit corrosion shall be reported to the Commission pursuant to Specification 6.9.2 within the next 30 days.

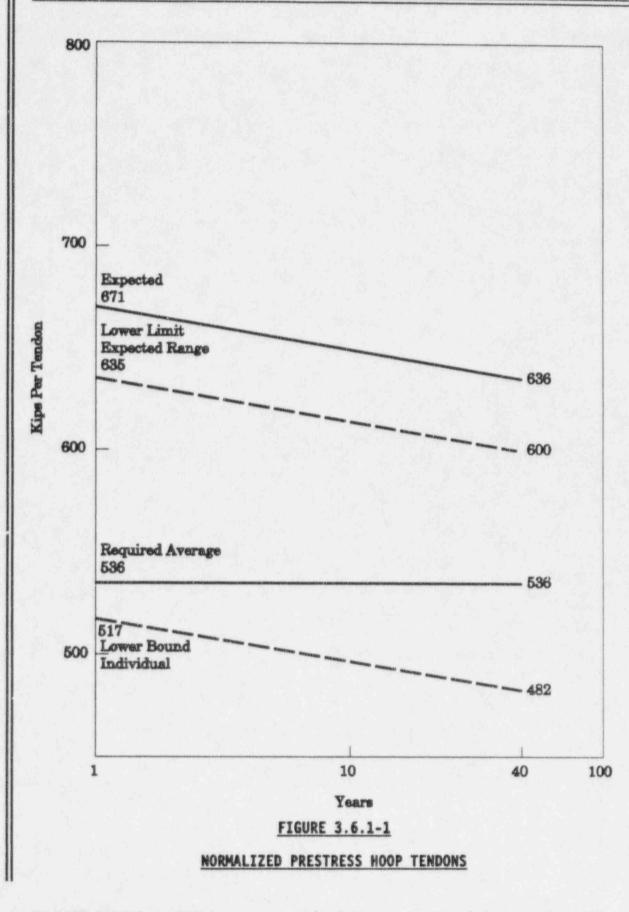
CALVERT CLIFFS - UNIT 1

## SURVEILLANCE REQUIREMENTS (Continued)

4.6.1.6.2 End Anchorages and Adjacent Concrete Surfaces. The structural integrity of the end anchorages and adjacent concrete surfaces shall be demonstrated by determining through inspection of a representative sample of tendons (reference Specification 4.6.1.6.1) that no apparent changes have occurred in the visual appearance of the end anchorages or their adjacent concrete exterior surfaces. Also, inspections of the pre-selected concrete crack patterns adjacent to end anchorages shall be performed during the Type A containment leakage rate tests (reference Specification 4.6.1.2) while the containment is at its maximum test pressure.

4.6.1.6.3 Containment Surfaces. The exposed accessible interior and exterior surfaces of the containment, including the liner plate shall be visually inspected in accordance with the Containment Leakage Rate Testing Program (reference Specification 4.6.1.2).

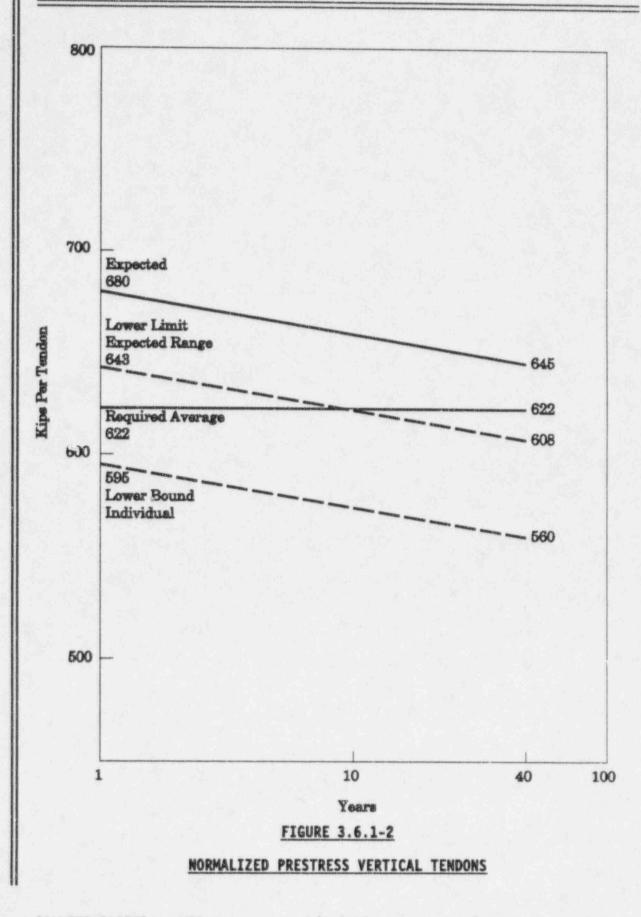
4.6.1.6.4 Reports. Any abnormal degradation of the containment structure detected during the above required tests and inspections shall be reported to the Commission pursuant to Specification 6.9.2 within the next 30 days. This report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective actions taken.



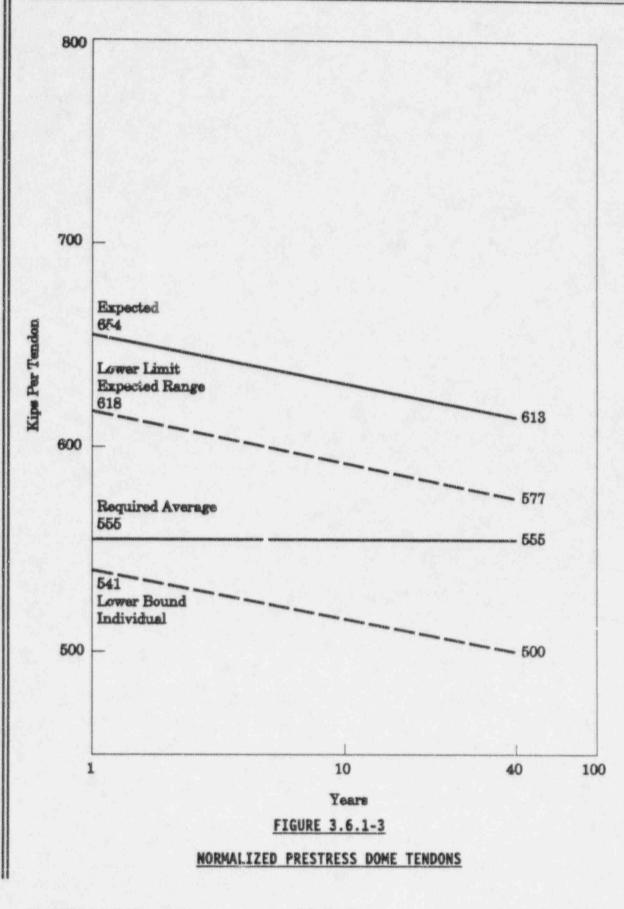
CALVERT CLIFFS - UNIT 1

3/4 6-11

Amendment No. 212



CALVERT CLIFFS - UNIT 1 3/4 6-12



CALVERT CLIFFS - UNIT 1 3/4 6-13

## 3/4.6.1 PRIMARY CONTAINMENT

Containment Purge System

## LIMITING CONDITION FOR OPERATION

3.6.1.7 The containment purge supply and exhaust isolation valves shall be closed by isolating air to the air operator and maintaining the solenoid air supply valve de-energized.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one containment purge supply and/or one exhaust isolation valve open, close the open valve(s) within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one containment purge supply and/or one exhaust isolation valve inoperable due to high leakage, repair the valve(s) within 24 hours or be in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.1.7 The 48-inch containment purge supply and exhaust isolation valves shall be determined closed at least once per 31 days, by verifying that power to the solenoid valve is removed.

## 3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

Containment Spray System

## LIMITING CONDITION FOR OPERATION

3.6.2.1 Two independent Containment Spray Systems shall be OPERABLE with each spray system capable of taking suction from the RWT on a Containment Spray Actuation Signal and Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal. Each spray system flow path from the containment sump shall be via an OPERABLE shutdown cooling heat exchanger.

APPLICABILITY: MODES 1, 2, and 3".

<u>ACTION</u>: With one Containment Spray System inoperable, restore the inoperable spray system to OPERABLE status within 72 hours or be in at least NOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.2.1 Each Containment Spray System shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
  - Verifying that upon a Recirculation Actuation Test Signal, the containment sump isolation valves open and that a recirculation mode flow path via an GPERABLE shutdown cooling heat exchanger is established.
  - Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed or otherwise secured in position is positioned to take suction from the RWT on a Containment Pressure-High test signal.
- b. At least once per REFUELING INTERVAL, during shutdown, by:
  - Verifying that each automatic valve in the flow path actuates to its correct position on the appropriate ESFAS test signal.
  - Verifying that each spray pump starts automatically on the appropriate ESFAS test signal.

With pressurizer pressure > 1750 psia.

CALVERT CLIFFS - UNIT 1

3/4 6-15

## SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 5 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

#### 3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

Containment Cooling System

#### LIMITING CONDITION FOR OPERATION

3.6.2.2 Two independent groups of containment air recirculation and cooling units shall be OPERABLE with two units to each group.

APPLICABILITY: MODES 1, 2 and 3.

### ACTION:

- With one group of required containment air recirculation and a. cooling units inoperable and both Containment Spray Systems OPERABLE, restore the inoperable group of air recirculation and cooling units to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within 12 hours.
- b. With three required containment air recirculation and cooling units inoperable and both Containment Spray Systems OPERABLE. restore at least one required air recirculation and cooling unit to OPERABLE status within 8 hours or be in at least NOT SHUTDOWN within 12 hours. Restore both above required groups of containment air recirculation and cooling units to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within 12 hours.
- c. With one group of required containment air recirculation and cooling units inoperable and one Containment Spray System inoperable, restore the inoperable Containment Spray System to OPERABLE status within 72 hours or be in at least NOT SHUTDOWN within 12 hours. Restore the inoperable group of containment air recirculation and cooling units to OPERABLE status within 7 days of initial loss or be in at least HOT SHUTDOWN within 12 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.2.2 Each containment air recirculation and cooling unit shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
  - 1. Starting each unit from the control room.

## SURVEILLANCE REQUIREMENTS (Continued)

- 2. Verifying that each unit operates for at least 15 minutes.
- 3. Verifying a cooling water flow rate of  $\geq$  2000 gpm to each cooling unit when the full flow service water outlet valves are fully open.
- b. At least once per REFUELING INTERVAL by verifying that each unit starts automatically on the appropriate ESFAS test signal.

3/4.6.3 IODINE REMOVAL SYSTEM

## LIMITING CONDITION FOR OPERATION

3.6.3.1 Three independent containment iodine filter trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION: With one iodine filter train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.3.1 Each iodine filter train shall be demonstrated OPERABLE:

- a. At least once per 31 days on a **STAGGERED TEST BASIS** by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.
- b. At least once per REFUELING INTERVAL or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
  - Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm ± 10%.
  - 2. Verifying that the HEPA filter banks remove  $\geq$  99% of the DOP when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm  $\pm$  10%.

CALVERT CLIFFS - UNIT 1

3/4 6-19

Amendment No. 212

## SURVEILLANCE REQUIREMENTS (Continued)

- 3. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of ≥ 95% for radioactive elemental iodine when the sample is tested in accordance with ANSI N510-1975 (130°C, 95% R.H.).
- 4. Verifying a filter train flow rate of 20,000 cfm  $\pm$  10% during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation by:

Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of  $\geq$  95% for radioactive elemental iodine when the sample is tested in accordance with ANSI N510-1975 (130°C, 95% R.H.).

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the filter train shall be demonstrated **OPERABLE** by also verifying that the charcoal adsorbers remove  $\geq 99\%$  of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm  $\pm 10\%$ .

- d. At least once per REFUELING INTERVAL by:
  - 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the filter train at a flow rate of 20,000 cfm  $\pm$  10%.

CALVERT CLIFFS - UNIT 1

## SURVEILLANCE REQUIREMENTS (Continued)

- 2. Verifying that the filter train starts on the appropriate ESFAS test signal.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove > 99% of the DOP when they are tested in place in accordance with Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm ± 10%.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove ≥ 99% of a halogenaied hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm + 10%.
- g. After maintenance affecting the air flow distribution by testing in-place and verifying that the air flow distribution is uniform within ± 20% of the average flow per unit when tested in accordance with the provisions of Section 9 of "Industrial Ventilation" and Section 8 of ANSI N510-1975.

## 3/4.6.4 CONTAINMENT ISOLATION VALVES

### LIMITING CONDITION FOR OPERATION

3.6.4.1 Each containment isolation valve shall be OPERABLE. \* \*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION: With one or more of the isolation valve(s) inoperable, either:

- Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate the affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. The provisions of Specification 3.0.4 are not applicable provided that the affected penetration is isolated.

#### SURVEILLANCE REQUIREMENTS

4.6.4.1.1 Each containment isolation valve shall be demonstrated **OPERABLE'** prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit by performance of a cycling test and verification of isolation time.

Valves that are normally closed may be opened on an intermittent basis under administrative control.

Containment purge isolation valves isolation times will only apply in MODE 6 when the valves are required to be OPERABLE and they are open. Isolation times for containment purge isolation valves is NA for MODES 1, 2, 3 and 4 per Technical Specification 3/4 6.1.7, during which time these valves must remain closed.

CALVERT CLIFFS - UNIT 1

\*

#

Amendment No. 212

### SURVEILLANCE REQUIREMENTS (Continued)

4.6.4.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SNUTDOWN or REFUELING MODE at least once per REFUELING INTERVAL by:

- a. Verifying that on each containment isolation Channel A or Channel B test signal, each required isolation valve actuates to its isolation position.
- b. Verifying that on each Containment Radiation-High Test Channel A or Channel B test signal, both required containment purge valves actuate to their isolation position.
- c. Verifying that on each Safety Injection Actuation Channel A or Channel B test signal, each required isolation valve actuates to its isolation position.

4.6.4.1.3 The isolation time of each power-operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Technical Specification 4.0.5.

3/4.6.5 COMBUSTIBLE GAS CONTROL

Hydrogen Analyzers

#### LIMITING CONDITION FOR OPERATION

3.6.5.1 Two independent containment hydrogen analyzers shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

#### ACTION:

- a. With one hydrogen analyzer inoperable, restore the inoperable analyzer to OPERABLE status within 30 days or:
  - Verify containment atmosphere grab sampling capability and prepare and submit a special report to the Commission pursuant to Specification 6.9.2 within the following 30 days, outlining the ACTION taken, the cause for the inoperability, and the plans and schedule for restoring the system to OPERABLE status, or
  - 2. Be in at least HOT STANDBY within the next 6 hours.
- b. With both hydrogen analyzers inoperable, restore at least one inoperable analyzer to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours.
- c. Specification 3.0.4 is not applicable to this requirement.

#### SURVEILLANCE REQUIREMENTS

4.6.5.1.1 Each hydrogen analyzer shall be demonstrated **OPERABLE** at least bi-weekly on a **STAGGERED TEST BASIS** by drawing a sample from the Waste Gas System through the hydrogen analyzer.

4.6.5.1.2 Each hydrogen analyzer shall be demonstrated OPERABLE at least once per 92 days on a STAGGERED TEST BASIS by performing a CHANNEL CALIBRATION using sample gases in accordance with manufacturers' recommendations.

3/4.6.5 COMBUSTIBLE GAS CONTROL

Electric Hydrogen Recombiners - W

#### LIMITING CONDITION FOR OPERATION

3.6.5.2 Two independent Containment Hydrogen Recombiner Systems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

<u>ACTION</u>: With one Hydrogen Recombiner System inoperable, restore the inoperable system to **OPERABLE** status within 30 days or be in at least **HOT STANDBY** within the next 6 hours.

#### SURVEILLANCE REQUIREMEN'S

- 4.6.5.2 Each Hydrogen Recombiner System shall be demonstrated OPERABLE:
  - a. At least once per 6 months by verifying during a recombiner system functional test that the minimum heater sheath temperature increases to  $\geq$  700°F within 90 minutes and is maintained for at least 2 hours.
  - b. At least once per REFUELING INTERVAL b, .
    - Performing a CHANNEL CALIBRATION of all recombiner instrumentation and control circuits.
    - Verifying through a visual examination that there is no evidence of abnormal conditions within the recombiners (i.e., loose wiring or structural connections, deposits of foreign materials, etc.)
    - Verifying during a recombiner system functional test that the heater sheath temperature increase to ≥ 1200°F within 5 hours is maintained for at least 4 hours.
    - 4. Verifying the integrity of the heater electrical circuits by performing a continuity and resistance to ground test following the above required functional test. The resistance to ground for any heater phase shall be > 10,000 ohms.

3/4.6.6 PENETRATION ROOM EXHAUST AIR FILTRATION SYSTEM

## LIMITING CONDITION FOR OPERATION

3.6.6.1 Two independent containment penetration room exhaust air filter trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION: With one containment penetration room exhaust air filter train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

## SURVEILLANCE REQUIREMENTS

4.6.6.1 Each containment penetration room exhaust air filter train shall be demonstrated OPERABLE:

- a. At least once per 31 days on STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
  - Verifying that the charcoal adsorbers remove > 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm ± 10%.

CALVERT CLIFFS - UNIT 1

3/4 6-26

## SURVEILLANCE REQUIREMENTS (Continued)

- 2. Verifying that the HEPA filter banks remove  $\geq$  99% of the DOP when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm  $\pm$  10%.
- 3. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of ≥ 90% for radioactive methyl iodine when the sample is tested in accordance with ANSI N510-1975 (30°C, 95% R.H.).
- 4. Verifying a system flow rate of 2000 cfm  $\pm$  10% during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation by:

Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of  $\geq$  90% for radioactive methyl iodine when the sample is tested in accordance with ANSI N510-1975 (30°C, 95% R.H.).

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the filter train shall be demonstrated **OPERABLE** by verifying that the charcoal adsorbers remove  $\geq 99\%$  of the halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the ventilation system at a flow rate of 2000 cfm  $\pm 10\%$ .

CALVERT CLIFFS - UNIT 1

3/4 6-27

## SURVEILLANCE REQUIREMENTS (Continued)

- d. At least once per 18 months by:
  - 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the filter train at a flow rate of 2000 cfm  $\pm$  10%.
  - Verifying that the filter train starts on Containment Isolation Test Signal.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove  $\geq$  99% of the DOP when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm  $\pm$  10%.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm ± 10%.
- g. After maintenance affecting the air flow distribution by testing in-place and verifying that the air flow distribution is uniform within <u>+</u> 20% of the average flow per unit when tested in accordance with the provisions of Section 9 of "Industrial Ventilation" and Section 8 of ANSI N510 1975.

#### 6.0 ADMINISTRATIVE CONTROLS

6.17.2 Licensee initiated changes to the ODCM:

- a. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
  - Sufficient information to support the rationale for the change. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with a change number and/or change date together with appropriate analyses or evaluations justifying the change(s);
  - A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
  - Documentation of the fact that the change has been reviewed and found acceptable by the POSRC.
- b. Shall become effective upon review by the POSRC and approval of the Plant General Manager.

#### 6.18 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS

6.18.1 Licensee initiated major changes to the Radioactive Waste Systems (liquid, gaseous and solid) shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the modification to the waste system is completed. The discussion of each change shall contain:

- A description of the equipment, components and processes involved.
- b. Documentation of the fact that the change including the safety analysis was reviewed and found acceptable by the POSRC.

#### 6.19 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage testing of the containment as required by 10 CFR 50.54(o) and 10 CFR Part 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, as modified by approved exceptions.

The peak calculated containment internal pressure for the design basis loss-of-coolant accident,  $P_a$ , is 49.4 psig. The containment design pressure is 50 psig.

CALVERT CLIFFS - UNIT 1

Amendment No. 212

#### 6.0 ADMINISTRATIVE CONTROLS

The maximum allowable containment leakage rate,  $L_a$ , shall be 0.20 percent of containment air weight per day at  $P_a$ .

Containment leakage rate acceptance criterion is  $\leq 1.0$  L. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria is  $\leq 0.75$  L<sub>a</sub> for Type A tests.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

#### BASES

#### 3/4.6.1 PRIMARY CONTAINMENT

### 3/4.6.1.1 CONTAINMENT INTEGRITY

In MODES 1, 2, 3, and 4, primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with the leakage rate limitation, will limit the SITE BOUNDARY radiation doses to within the limits of 10 CFR Part 100 during accident conditions. In MODES 5 and 6, the probability and consequences of these events are reduced because of the Reactor Coolant System (RCS) pressure and temperature limitations of these modes, by preventing operations which could lead to a need for containment isolation, and by providing containment isolation through penetration closure.

### 3/4.6.1.2 Containment Leakage

Maintaining the containment **OPERABLE** requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Program for Type A tests, and 10 CFR Part 50, Appendix J, Option A for Type B and C tests. As-left leakage prior to the first startup after performing a required leakage test is required to be  $\leq 0.75 L_a$  for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of  $\leq 1.0 L_a$ . At  $\leq 1.0 L_a$  the offsite dose consequences are bounded by the assumptions of the safety analysis. The frequency of Type A testing is specified in the Containment Leakage Rate Testing Program.

The surveillance testing for measuring leakage rates are consistent with the requirements of 10 CFR Part 50, Appendix J, Option B for Type A tests. For Type B and C testing, the allowable leakage rate has been proportionately reduced, as recommended in Generic Letter 91-04, to account for an extended surveillance schedule of 24 months + 25% (per Specification 4.0.2). This is an exception from 10 CFR Part 50, Appendix J.

#### 3/4.6.1.3 Containment Air Locks

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on **CONTAINMENT INTEGRITY** and containment leak rate. Surveillance testing of the air lock seals provides assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.

CALVERT CLIFFS - UNIT 1

B 3/4 6-1

Amendment No. 212

#### BASES

## 3/4.6.1.4 Internal Pressure

The limitations on containment internal pressure ensure that 1) the containment structure is prevented from exceeding it design negative pressure differential with respect to the outside atmosphere of 3.0 psig and 2) the containment peak pressure does not exceed the design pressure of 50 psig during LOCA or steam line break conditions.

The maximum peak pressure expected to be obtained from a LOCA event is 47.6 psig assuming an initial containment pressure of 14.7 psia. The limit of 1.8 psig for initial positive containment pressure will limit the total pressure to 49.4 psig which is less than the design pressure and is consistent with the accident analyses. The maximum peak pressure expected to be obtained from a steam line break event is 49.2 psig assuming an initial containment pressure of 16.5 psia (1.8 psig).

#### 3/4.6.1.5 Air Temperature

The limitation on containment average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 276°F during LOCA conditions. The containment temperature limit is consistent with the accident analyses.

## 3/4.6.1.6 Containment Structural Integrity

The limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the containment will withstand the maximum pressure of 47.6 psig in the event of a LOCA. The measurement of containment tendon lift off force, the visual and metallurgical examination of tendons, anchorages and liner and the Type A leakage tests are sufficient to demonstrate this capability.

The surveillance requirements for demonstrating the containment's structural integrity are consistent with the intent of the recommendations of Regulatory Guide 1.35 "Inservice Surveillance of Ungrouted Tendons in Prestressed Concrete Containment Structures", January 1976.

The end anchorage concrete exterior surfaces are checked visually for indications of abnormal material behavior during tendon surveillance. Inspections of pre-selected concrete crack patterns are performed during the Type A containment leakage rate tests, consistent with the Structural Integrity Test.

Visual inspections of the accessible interior and exterior surfaces of the containment are performed to allow for early uncovering of evidence of structural deterioration. The frequency of these inspections is in agreement with Regulatory Guide 1.163, dated September 1995.

CALVERT CLIFFS - UNIT 1 B 3/4 5-2

Amendment No. 212

# 3/4.6.1 PRIMARY CONTAINMENT

Containment Leakage

# LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

- a. A maximum allowable containment leakage rate, L, as specified in Specification 6.19, "Containment Leakage Rate Testing Program."
- b. A combined leakage rate of  $\leq 0.50$  L (173,000 SCCM), for all penetrations and valves subject to Type B and C tests when pressurized to P.

APPLICABILITY: MODES 1, 2, 3 and 4.

<u>ACTION</u>: With either (a) the measured overall integrated containment leakage rate exceeding the acceptance criteria specified in the Containment Leakage Rate Testing Program, or (b) with the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding 0.50 L, restore the overall integrated containment leakage rate to within the acceptance criteria specified in the Containment Leakage Rate Testing Program, and the combined leakage rate for all penetrations and valves subject to Type B and C tests to less than or equal to 0.50 L, prior to increasing the Reactor Coolant System temperature above 200°F.

### SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria, methods and provisions specified in 10 CFR Part 50, Appendix J:

a. Perform required visual examinations and Type A testing in accordance with the Containment Leakage Rate Testing Program.

# SURVEILLANCE REQUIREMENTS (Continued)

- b. Type B and C tests shall be conducted with gas at P. (50 psig) at intervals of 24 months except for tests involving air locks."
- c. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.1.3.
- d. All Type B and C test leakage rates shall be calculated using observed data converted to absolute values.
- e. Containment purge isolation valves shall be demonstrated OPERABLE any time upon entering MODE 5 from POWER OPERATION MODES, unless the last surveillance test has been performed within the past 6 months or any time after being opened and prior to entering MODE 4 from shutdown modes by verifying that when the measured leakage rate is added to the leakage rates determined pursuant to Technical Specification 4.6.1.2.b for all other Type B or C penetrations, the combined leakage rate is less than or equal to 0.50 L<sub>a</sub> (173,000 SCCM). The leakage rate for the containment purge isolation valves shall also be compared to the previously measured leakage rate to detect excessive valve degradation.
- f. The containment purge isolation valve seals shall be replaced with new seals at a frequency to ensure no individual seal remains in service greater than 2 consecutive fuel reload cycles.

Exemption to 10 CFR Part 50, Appendix J.

CALVERT CLIFFS - UNIT 2

3/4 6-3

3/4.6.1 PRIMARY CONTAINMENT

Containment Air Locks

# LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

- a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and
- b. An overall air lock leakage rate of  $\leq 0.05 L_a$  (17,300 SCCM) at P<sub>a</sub>, 50 psig.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With an air lock inoperable, except as a result of an inoperable door gasket, restore the air lock to **OPERABLE** status within 24 hours or be in at least **HOT STANDBY** within the next 6 hours and in **COLD SHUTDOWN** within the following 30 hours.
- b. With an air lock inoperable due to an inoperable door gasket:
  - Maintain the remaining door of the affected air lock closed and sealed, and
  - Restore the air lock to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

a.\* After each opening, except when the air lock is being used for multiple entries, then at least once per 72 hours by verifying that the seal leakage is < 0.0002 L (69.2 SCCM) as determined by precision flow measurement when the volume between the door seals is pressurized to a constant pressure of 15 psig.

Exemption to 10 CFR Part 50, Appendix J.

CALVERT CLIFFS - UNIT 2

3/4 6-4

Amendment No. 189

# SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 6 months by conducting an overall air lock leakage test at P, (50 psig) and by verifying that the overall air lock leakage rate is within its limit, and
- c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

#### 3/4.6.1 PRIMARY CONTAINMENT

Internal Pressure

# LIMITING CONDITION FOR OPERATION

3.6.1.4 Primary containment internal pressure shall be maintained between -1.0 and 1.8 psig.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION: With the containment internal pressure outside of the limits above, restore the internal pressure to within the limits within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.1.4 The primary containment internal pressure shall be determined to be within the limits at least once per 12 hours.

#### 3/4.6.1 PRIMARY CONTAINMENT

Air Temperature

# LIMITING CONDITION FOR OPERATION

3.6.1.5 Primary containment average air temperature shall not exceed 120°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION: With the containment average air temperature > 120°F, reduce the average air temperature to within the limit within 8 hours, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

# SURVEILLANCE REQUIREMENTS

4.6.1.5 The primary containment average air temperature shall be the arithmetical average of the temperatures at the following locations and shall be determined at least once per 24 hours:

#### Location

- a. Containment Dome
- b. Containment Reactor Cavity

# 3/4.6.1 PRIMARY CONTAINMENT

Containment Structural Integrity

# LIMITING CONDITION FOR OPERATION

3.6.1.6 The structural integrity of the containment shall be maintained at a level consistent with the acceptance criteria in Specification 4.6.1.6.

APPLICABILITY: MODES 1, 2, 3 and 4.

<u>ACTION</u>: With the structural integrity of the containment not conforming to the above requirements, restore the structural integrity to within the limits within 24 hours or be in at least **HOT STANDBY** within the next 6 hours and in **COLD SHUTDOWN** within the following 30 hours.

# SURVEILLANCE REQUIREMENTS

4.6.1.6.1 <u>Containment Tendons</u>. The containment tendons' structural integrity shall be demonstrated at the end of one, three and five years following the initial containment structural integrity test and at five year intervals thereafter. The tendons' structural integrity shall be demonstrated by a visual examination (to the extent practical and without dismantling load bearing components of the anchorage) of a representative sample of at least 21 tendons (6 dome, 5 vertical, and 10 hoop) and verifying no abnormal degradation. Unless there is evidence of abnormal degradation of the containment structure during the first three tests of the tendons, the number of tendons examined during subsequent tests may be reduced to a representative sample of at least 9 tendons (3 dome, 3 vertical and 3 hoop).

4.6.1.6.2 End Anchorages and Adjacent Concrete Surfaces. The structural integrity of the end anchorages and adjacent concrete surfaces shall be demonstrated by determining through inspection of a representative sample of tendons (reference Specification 4.6.1.6.1) that no apparent changes have occurred in the visual appearance of the end anchorages or their adjacent concrete exterior surfaces. Also, inspections of the pre-selected concrete crack patterns adjacent to end anchorages shall be performed during the Type A containment leakage rate tests (reference Specification 4.6.1.2) while the containment is at its maximum test pressure.

CALVERT CLIFFS - UNIT 2

# SURVEILLANCE REQUIREMENTS (Continued)

4.6.1.6.3 <u>Containment Surfaces</u>. The exposed accessible interior and exterior surfaces of the containment, including the liner plate shall be visually inspected in accordance with the Containment Leakage Rate Testing Program (reference Specification 4.6.1.2).

4.6.1.6.4 <u>Reports</u>. Any abnormal degradation of the containment structure detected during the above required tests and inspections shall be reported to the Commission pursuant to Specification 6.9.2 within the next 30 days. This report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective actions taken.

### 3/4.6.1 PRIMARY CONTAINMENT

Containment Purge System

# LIMITING CONDITION FOR OPERATION

3.6.1.7 The containment purge supply and exhaust isolation valves shall be closed by isolating air to the air operator and maintaining the solenoid air supply valve deenergized.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one containment purge supply and/or one exhaust isolation valve open, close the open valve(s) within one hour or be in at least NOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one containment purge supply and/or exhaust isolation valve inoperable due to high leakage, repair the valve(s) within 24 hours or be in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.1.7 The 48-inch containment purge supply and exhaust isolation valves shall be determined closed at least once per 31 days, by verifying that power to the solenoid valve is removed.

3/4 6-10

Amendment No. 189

#### 3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

Containment Spray System

# LIMITING CONDITION FOR OPERATION

3.6.2.1 Two independent Containment Spray Systems shall be OPERABLE with each spray system capable of taking suction from the RWT on a Containment Spray Actuation Signal and Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal. Each spray system flow path from the containment sump shall be via an OPERABLE shutdown cooling heat exchanger.

APPLICABILITY: MODES 1. 2. and 3".

ACTION: With one Containment Spray System inoperable, restore the inoperable spray system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

### SURVEILLANCE REQUIREMENTS

4.6.2.1 Each Containment Spray System shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
  - 1. Verifying that upon a Recirculation Actuation Test Signal. the containment sump isolation valves open and that a recirculation mode flow path via an OPERABLE shutdown cooling heat exchanger is established.
  - 2. Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed or otherwise secured in position is positioned to take suction from the RWT on a Containment Pressure-High test signal.
- b. At least once per **REFUELING INTERVAL**, during shutdown, by:
  - 1. Verifying that each automatic valve in the flow path actuates to its correct position on the appropriate ESFAS test signal.
  - 2. Verifying that each spray pump starts automatically on the appropriate ESFAS test signal.

With pressurizer pressure > 1750 psia.

CALVERT CLIFFS - UNIT 2 3/4 6-11

# SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 5 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

# 3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

Containment Cooling System

# LIMITING CONDITION FOR OPERATION

3.6.2.2 Two independent groups of containment air recirculation and cooling units shall be **OPERABLE** with two units to each group.

APPLICABILITY: MODES 1, 2 and 3.

#### ACTION:

- a. With one group of required containment air recirculation and cooling units inoperable and both Containment Spray Systems OPERABLE, restore the inoperable group of air recirculation and cooling units to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within 12 hours.
- b. With three required containment air recirculation and cooling units inoperable and both Containment Spray Systems OPERABLE, restore at least one required air recirculation and cooling unit to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within 12 hours. Restore both above required groups of containment air recirculation and cooling units to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within 12 hours.
- c. With one group of required containment air recirculation and cooling units inoperable and one Containment Spray System inoperable, restore the inoperable Containment Spray System to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within 12 hours. Restore the inoperable group of containment air recirculation and cooling units to OPERABLE status within 7 days of initial loss or be in at least HOT SHUTDOWN within 12 hours.

# SURVEILLANCE REQUIREMENTS

4.6.2.2 Each containment air recirculation and cooling unit shall be demonstrated **OPERABLE**:

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
  - 1. Starting each unit from the control room.

# SURVEILLANCE REQUIREMENTS (Continued)

- 2. Verifying that each unit operates for at least 15 minutes.
- Verifying a cooling water flow rate of 
  2000 gpm to each
  cooling unit when the full flow service water outlet valves
  are fully open.
- b. At least once per REFUELING INTERVAL by verifying that each unit starts automatically on the appropriate ESFAS test signal.

# 3/4.6.3 IODINE REMOVAL SYSTEM

#### LIMITING CONDITION FOR OPERATION

3.6.3.1 Three independent containment iodine filter trains shall be **OPERABLE**.

APPLICABILITY: MODES 1, 2, 3 and 4.

<u>ACTION</u>: With one iodine filter train inoperable, restore the inoperable train to **OPERABLE** status within 7 days or be in at least **HOT STANDBY** within the next 6 hours and in **COLD SHUTDOWN** within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.3.1 Each iodine filter train shall be demonstrated OPERABLE:

- a. At least once per 31 days on a **STAGGERED TEST BASIS** by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.
- b. At least once per REFUELING INTERVAL or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
  - Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm ± 10%.
  - Verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm ± 10%.

### SURVEILLANCE REQUIREMENTS (Continued)

- 3. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of ≥ 95% for radioactive elemental iodine when the sample is tested in accordance with ANSI N510-1975 (130°C, 95% R.H.).
- 4. Verifying a filter train flow rate of 20,000 cfm  $\pm$  10% during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation by:

Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of  $\geq$  95% for radioactive elemental iodine when the sample is tested in accordance with ANSI N510-1975 (130°C, 95% R.H.).

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the filter train shall be demonstrated **OPERABLE** by also verifying that the charcoal adsorbers remove  $\geq 99\%$  of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm  $\pm$  10%.

3/4 6-16

#### SURVEILLANCE REQUIREMENTS (Continued)

- d. At least once per REFUELING INTERVAL by:
  - 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the filter train at a flow rate of 20,000 cfm + 10%.
  - 2. Verifying that the filter train starts on the appropriate ESFAS test signal.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove > 99% of the DOP when they are tested in place in accordance with Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm + 10%.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove > 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52 Revision 2 March 1978 while operating the filter train at a flow rate of 20,000 cfm + 10%.
- g. After maintenance affecting the air flow distribution by testing in-place and verifying that the air flow distribution is uniform within + 20% of the average flow per unit when tested in accordance with the provisions of Section 9 of "Industrial Ventilation" and Section 8 of ANSI N510-1975.

# 3/4.6.4 CONTAINMENT ISOLATION VALVES

# LIMITING CONDITION FOR OPERATION

3.6.4.1 Each containment isolation valve shall be OPERABLE." \*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION: With one or more of the isolation valve(s) inoperable, either:

- Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate the affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. The provisions of Specification 3.0.4 are not applicable provided that the affected penetration is isolated.

### SURVEILLANCE REQUIREMENTS

4.6.4.1.1 Each containment isolation valve shall be demonstrated **OPERABLE'** prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit by performance of a cycling test and verification of isolation time.

Valves that are normally closed may be opened on an intermittent basis under administrative control.

Containment purge isolation valves isolation times will only apply in MODE 6 when the valves are required to be OPERABLE and they are open. Isolation times for containment purge isolation valves is NA for MODES 1, 2, 3 and 4 per Technical Specification 3/4 6.1.7, during which time these valves must remain closed.

CALVERT CLIFFS - UNIT 2

\*

#

Amendment No. 189

#### SURVEILLANCE REQUIREMENTS (Continued)

4.6.4.1.2 Each containment isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per REFUELING INTERVAL by:

- a. Verifying that on each containment isolation Channel A or Channel B test signal, each required isolation valve actuates to its isolation position.
- b. Verifying that on each Containment Radiation-High Test Channel A or Channel B test signal, both required containment purge valves actuate to their isolation position.
- c. Verifying that on each Safety Injection Actuation Channel A or Channel B test signal, each required isolation valve actuates to its isolation position.

4.6.4.1.3 The isolation time of each power-operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Technical Specification 4.0.5.

3/4.6.5 COMBUSTIBLE GAS CONTROL

Hydrogen Analyzers

### LIMITING CONDITION FOR OPERATION

3.6.5.1 Two independent containment hydrogen analyzers shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

- a. With one hydrogen analyzer inoperable, restore the inoperable analyzer to **OPERABLE** status within 30 days or:
  - Verify containment atmosphere grab sampling capability and prepare and submit a special report to the Commission pursuant to Specification 6.9.2 within the following 30 days, outlining the action taken, the cause for the inoperability, and the plans and schedule for restoring the system to OPERABLE status, or
  - 2. Be in at least HOT STANDBY within the next 6 hours.
- b. With both hydrogen analyzers inoperable, restore at least one inoperable analyzer to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours.
- c. Specification 3.0.4 is not applicable to this requirement.

# SURVEILLANCE REQUIREMENTS

4.6.5.1.1 Each hydrogen analyzer shall be demonstrated **OPERABLE** at least bi-weekly on a **STAGGERED TEST BASIS** by drawing a sample from the Waste Gas System through the hydrogen analyzer.

4.6.5.1.2 Each hydrogen analyzer shall be demonstrated OPERABLE at least once per 92 days on a STAGGERED TEST BASIS by performing a CHANNEL CALIBRATION using sample gases in accordance with manufacturers' recommendations.

3/4.6.5 COMBUSTIBLE GAS CONTROL

Electric Hydrogen Recombiners - W

# LIMITING CONDITION FOR OPERATION

3.6.5.2 Two independent Containment Hydrogen Recombiner Systems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

<u>ACTION</u>: With one Hydrogen Recombiner System inoperable, restore the inoperable system to **OPERABLE** status within 30 days or be in at least HOT **STANDBY** within the next 6 hours.

### SURVEILLANCE REQUIREMENTS

4.6.5.2 Each Hydrogen Recombiner System shall be demonstrated OPERABLE:

- a. At least once per 6 months by verifying during a recombiner system functional test that the minimum heater sheath temperature increases to  $\geq 700^{\circ}$ F within 90 minutes and is maintained for at least 2 hours.
- b. At least once per REFUELING INTERVAL by:
  - Performing a CHANNEL CALIBRATION of all recombiner instrumentation and control circuits.
  - Verifying through a visual examination that there is no evidence of abnormal conditions within the recombiners (i.e., loose wiring or structural connections, deposits of foreign materials, etc.)
  - 3. Verifying during a recombiner system functional test that the heater sheath temperature increase to  $\geq 1200^{\circ}$ F within 5 hours is maintained for at least 4 hours.
  - 4. Verifying the integrity of the heater electrical circuits by performing a continuity and resistance to ground test following the above required functional test. The resistance to ground for any heater phase shall be > 10,000 ohms.

# 3/4.6.6 PENETRATION ROOM EXHAUST AIR FILTRATION SYSTEM

### LIMITING CONDITION FOR OPERATION

3.6.6.1 Two independent containment penetration room exhaust air filter trains shall be **OPERABLE**.

APPLICABILITY: MODES 1, 2, and 3.

<u>ACTION</u>: With one containment penetration room exhaust air filter train inoperable, restore the inoperable train to **OPERABLE** status within 7 days or be in at least **HOT STANDBY** within the next 6 hours and in **COLD SHUTDOWN** within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

4.6.6.1 Each containment penetration room exhaust air filter train shall be demonstrated **OPERABLE**:

- a. At least once per 31 days on STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
  - Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm ± 10%.

# SURVSILLANCE REQUIREMENTS (Continued)

- 2. Verifying that the HEPA filter banks remove > 99% of the DOP when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm + 10%.
- Verifying within 31 days after removal that a laboratory 3. analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of  $\geq$  90% for radioactive methyl iodine when the sample is tested in accordance with ANSI N510-1975 (30°C, 95% R.H.).
- 4. Verifying a system flow rate of 2000 cfm ± 10% during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation by:

Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained from an adsorber tray or from an adsorber test tray in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, demonstrates a removal efficiency of  $\geq$  90% for radioactive methyl iodine when the sample is tested in accordance with ANSI N510-1975 (30°C, 95% R.H.).

# SURVEILLANCE REQUIREMENTS (Continued)

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the filter train shall be demonstrated OPERABLE by verifying that the charcoal adsorbers remove > 99% of the halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the ventilation system at a flow rate of 2000 cfm + 10%.

- At least once per 18 months by: d.
  - 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the filter train at a flow rate of 2000 cfm + 10%.
  - 2. Verifying that the filter train starts on Containment Isolation Test Signal.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove > 99% of the DOP when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm + 10%.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove > 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, while operating the filter train at a flow rate of 2000 cfm + 10%.
- g. After maintenance affecting the air flow distribution by testing in-place and verifying that the air flow distribution is uniform within + 20% of the average flow per unit when tested in accordance with the provisions of Section 9 of "Industrial Ventilation" and Section 8 of ANSI N510 1975.

CALVERT CLIFFS - UNIT 2 3/4 6-24

# 6.0 ADMINISTRATIVE CONTROLS

# 6.19 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage testing of the containment as required by 10 CFR 50.54(o) and 10 CFR Part 50, Appendix J, Option B. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss-of-coolant accident,  $P_a$ , is 49.4 psig. The containment design pressure is 50 psig.

The maximum allowable containment leakage rate,  $L_a$ , shall be 0.20 percent of containment air weight per day at  $P_a$ .

Containment leakage rate acceptance criterion is  $\leq 1.0$  L. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria is  $\leq 0.75$  L<sub>a</sub> for Type A tests.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

#### BASES

#### 3/4.6.1 PRIMARY CONTAINMENT

### 3/4.6.1.1 CONTAINMENT INTEGRITY

In MODES 1, 2, 3, and 4, primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with the leakage rate limitation, will limit the SITE BOUNDARY radiation doses to within the limits of 10 CFR Part 100 during accident conditions. In MODES 5 and 6. the probability and consequences of these events are reduced because of the Reactor Coolant System (RCS) pressure and temperature limitations of these modes, by preventing operations which could lead to a need for containment isolation, and by providing containment isolation through penetration closure.

# 3/4.6.1.2 Containment Leakage

Maintaining the containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Frogram for Type A tests, and 10 CFR Part 50, Appendix J, Option A for Type B and C tests. As-left leakage prior to the first startup after performing a required leakage test is required to be < 0.75 L, for overall Type A leakage. At all other times between required Teakage rate tests, the acceptance criter' is based on an overall Type A leakage limit of  $\leq 1.0$  L. At  $\leq 1.0$  L, the offsite dose consequences are bounded by the assumptions of the safety analysis. The frequency of Type A testing is specified in the Containment Leakage Rate Testing Program.

The surveillance testing for measuring leakage rates are consistent with the requirements of 10 CFR Part 50, Appendix J, Option B for Type A tests. For Type B and C testing, the allowable leakage rate has been proportionately reduced, as recommended in Generic Letter 91-04, to account for an extended surveillance schedule of 24 months + 25% (per Specification 4.0.2). This is an exception from 10 CFR Part 50. Appendix J.

### 3/4.6.1.3 Containment Air Locks

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on CONTAINMENT INTEGRITY and containment leak rate. Surveillance testing of the air lock seals provides assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.

CALVERT CLIFFS - UNIT 2 B 3/4 6-1

Amendment No. 189

## BASES

# 3/4.6.1.4 Internal Pressure

The limitations on containment internal pressure ensure that 1) the containment structure is prevented from exceeding it design negative pressure differential with respect to the outside atmosphere of 3.0 psig and 2) the containment peak pressure does not exceed the design pressure of 50 psig during LOCA or steam line break conditions.

The maximum peak pressure expected to be obtained from a LOCA event is 47.6 psig assuming an initial containment pressure of 14.7 psia. The limit of 1.8 psig for initial positive containment pressure will limit the total pressure to 49.4 psig which is less than the design pressure and is consistent with the accident analyses. The maximum peak pressure expected to be obtained from a steam line break event is 49.2 psig assuming an initial containment pressure of 16.5 psia (1.8 psig).

### 3/4.6.1.5 Air Temperature

The limitation on containment average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 276°F during LOCA conditions. The containment temperature limit is consistent with the accident analyses.

#### 3/4.6.1.6 Containment Structural Integrity

The limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the containment will withstand the maximum pressure of 47.6 psig in the event of a LOCA. The measurement of containment tendon lift off force, the visual and metallurgical examination of tendons, anchorages and liner and the Type A leakage tests are sufficient to demonstrate this capability.

The surveillance requirements for demonstrating the containment's structural integrity are consistent with the intent of the recommendations of Regulatory Guide 1.35 "Inservice Surveillance of Ungrouted Tendons in Prestressed Concrete Containment Structures", January 1976.

The end anchorage concrete exterior surfaces are checked visually for indications of abnormal material behavior during tendon surveillance. Inspections of pre-selected concrete crack patterns are performed during the Type A containment leakage rate tests, consistent with the Structural Integrity Test.

Visual inspections of the accessible interior and exterior surfaces of the containment are performed to allow for early uncovering of evidence of structural deterioration. The frequency of these inspections is in agreement with Regulatory Guide 1.163, dated September 1995.

CALVERT CLIFFS - UNIT 2 B 3/4 6-2

Amendment No. 189