

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C 20555-0001

April 4, 1996

Mr. Charles H. Cruse, Vice President Nuclear Energy Division Baltimore Gas and Electric Company 1650 Calvert Cliffs Parkway Lusby, Maryland 20657-47027

SUBJECT: FINAL SAFETY EVALUATION (FSE) CONCERNING THE BALTIMORE GAS &

ELECTRIC COMPANY REPORT ENTITLED, "INTEGRATED PLANT ASSESSMENT

METHODOLOGY"

Dear Mr. Cruse:

The U.S. Nuclear Regulatory Commission staff has reviewed your, "Integrated Plant Assessment Methodology," (Methodology) dated August 18, 1995, and as amended January 11, 1996, and is transmitting the Final Safety Evaluation (FSE) to you as an enclosure to this letter. The Advisory Committee on Reactor Safeguards had no comments on the staff's draft safety evaluation (DSE) dated February 7, 1996. Since there were no open issues in the staff's DSE, only minor editing changes were made in the enclosed FSE.

In the enclosed FSE, the staff concludes that the Methodology is acceptable for meeting the requirements of 10 CFR 54.21(a)(2) of the license renewal rule, and if implemented, provides reasonable assurance that all structures and components subject to an aging management review pursuant to 10 CFR 54.21(a)(1) will be identified. Additionally, the staff concludes that the Methodology provides processes for demonstrating that the effects of aging will be adequately managed pursuant to 10 CFR 54.21(a)(3) and for evaluating time limited aging analyses pursuant to 10 CFR 54.21(c) that are conceptually sound and consistent with the intent of the license renewal rule.

During the staff's review of the Methodology, two issues were raised that were determined to be more appropriately addressed in the course of specific license renewal technical reports. These issues concern 1) the level of detail to be included in the FSAR Supplement and the license renewal application, and 2) the timing of time-limited aging analyses evaluations relative to the submission of an application. As you are aware, the NRC recently completed an audit related to the implementation of the Nuclear Energy Institute (NEI) guideline for license renewal (NEI 95-10) at the Calvert Cliffs site as part of its participation in the NEI demonstration program. The NRC observations during this audit noted strong scoping and aging effects work, but highlighted continuing difficulties with the level of detail, TLAA issues, and some other weaknesses relative to the guideline and

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the renewal rule. The staff expects to explore these issues in more detail in the course of the remainder of the industry demonstration project and is prepared to address them in your follow-on technical reports.

Sincerely,

Dennis M. Crutchfield, Director Division of Reactor Program Management Office of Nuclear Reactor Regulation

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Docket Nos.: 50-317, 50-318

Enclosure: FSE

cc: See attached list

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* See previous concurrence

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