September 16, 1992

Docket Nos. 50-317
and 50-318

Mr. Robert E. Denton
Vice President - Nuclear Energy
Baltimore Gas & Electric Company
Calvert Cliffs Nuclear Power Plant
MD Rts. 2 & 4
P. O. Box 1535
Lusby, Maryland 20657

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CCowgill, RI
JHuang, 7E23

Dear Mr. Denton:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING RELIEF REQUEST FROM THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) CODE, SECTION III, ARTICLE 9, FOR CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 1 (TAC NO. M83999) AND UNIT 2 (TAC NO. M84000)

By letter dated June 30, 1992, Baltimore Gas and Electric Company (BG&E) requested permanent relief from the ASME Boiler and Pressure Vessel Code, Section III (1968 Edition), Article 9. The request is to allow a stop valve to remain installed downstream of thermal overpressure relief devices for the regenerative heat exchangers of each unit.

The staff is currently reviewing your submittal and has determined that additional information is needed to complete its review of your relief request. Enclosure 1 provides the staff's request for additional information (RAI). We request that the information identified in the RAI be provided within six weeks.

This request affects one respondent and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,
Original Signed By:
Daniel G. McDonald, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
RAI

cc w/enclosure:
See next page

PDI-1:LA	PDI-1:PM	PDI-1:D			
CVogan	DMcDonald:smm	RACapra			
9/14/92	09/16/92	9/16/92	/ /	/ /	/ /

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

September 16, 1992

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Vice President - Nuclear Energy
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P. O. Box 1535
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Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
RAI

cc w/enclosure:
See next page

cc:

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Co-Director
Maryland Safe Energy Coalition
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Baltimore, Maryland 21218

Enclosure 1

REQUEST FOR ADDITIONAL INFORMATION

The following information is needed by the staff to complete its review of the BG&E Relief Request dated June 30, 1992.

1. The installation of a manual stop valve on the discharge side of a pressure relieving device is a typical design at many nuclear facilities but the safety significance of the worst failure scenario of the manual stop valve varies significantly from plant to plant. BG&E has indicated that a failure of a manual stop valve will result in damages to the regenerative heat exchanger. To determine the safety significance of the event, provide the following: (1) postulated damages including rupture of a heat exchanger; (2) design features and emergency operating procedures for isolating the damages; and (3) the adverse impact of the damages on the performance of the High Pressure Safety Injection system.

2. 10 CFR 50.55a provides the staff with two approaches of reviewing and granting relief from ASME Code requirements. 50.55a(a)(3)(i) requires demonstration of an alternative that would provide an acceptable level of quality and safety, and 50.55a(a)(3)(ii) requires demonstration that compliance with Code requirements would result in hardship or unusual difficulties without a compensating increase in the level of quality and safety. BG&E proposes no design changes or system modifications, and has indicated that the cost associated with certain changes or modifications does not offset the minimal increase in safety. Based on 50.55a(a)(3)(ii), provide a cost/benefit analysis to substantiate the sustained hardship or unusual difficulties as a result of complying with the Code requirement.

3. Address the need of a continuous or periodic valve position verification program as an alternative for ensuring that the valves are maintained in the locked open position.

4. Specify the method for locking the valves in the open position. The NRC has accepted a chain or cable in series with a key or combination lock; or a lead seal in series with a chain or cable as acceptable locking devices.