

CHARLES CENTER • P.O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

February 26, 1985

U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Washington, DC 20555

ATTENTION: Mr. James R. Miller, Chief

Operating Reactors Branch #3

Division of Licensing

SUBJECT:

Calvert Cliffs Nuclear Power Plant

Unit Nos. 1 and 2, Docket Nos. 50-317 & 50-318

Request for Amendment

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 change to the Technical Specifications.

PROPOSED CHANGE (BG&E FCR 85-3002)

Remove existing page 3/4 10-1 of the Unit Nos. 1 and 2 Technical Specifications and replace with marked-up page attached to this transmittal.

DISCUSSION

During post-refueling startup testing CEA group worths are measured by their insertion into the core. Special Test Exception 3/4 10.1 allows shutdown margin reduced below the minimum Technical Specification limit to perform this measurement. Surveillance Requirement 4.10.1.2 imposes a reactor trip verification 24 hours prior to reducing Shutdown Margin below the Technical Specification limit. This additional trip interrupts startup testing, delays power operation and increases component wear. If the Surveillance Requirement allowed a reactor trip verification interval of seven (7) days instead of the current requirement of 24 hours the additional trip would not be required.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

The Surveillance Requirement provides reasonable assurance that all withdrawn CEA's will insert upon a reactor trip signal (i.e., no CEA stuck out). The only accidents impacted by a stuck CEA are those that may result in positive reactivity addition after a reactor trip (i.e., an overcooling event). Based on probabilistic risk assessment analysis the probability of an overcooling event with a untrippable CEA increases insignificantly (1.1×10^{-7}) to 4.8×10^{-7}) when the requirement for trip verification is increased from 24 hours to seven (7) days.

8503120285 850226 PDR ADDCK 05000317 PDR Rec! al wither \$150.00

3/40

Mr. J.R. Miller February 26, 1985 Page 2

The consequences of this accident or other accidents previously analyzed will not be affected by this proposed change. No new accident different from those previously analyzed will be created. No significant reduction in the margin of safety will occur. Based on the above, and the guidance provided on page 14870 of Federal Register Notice dated April 6, 1983, examples of Amendments that are considered not likely to involve Significant Hazards Consideration, Subsection (vi), the proposed change has been determined to not involve a significant hazard.

SAFETY COMMITTEE REVIEW

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

FEE DETERMINATION

Pursuant to 10CFR 170.21, Baltimore Gas and Electric Company check number A303015 in the amount of \$150.00 is remitted to cover the application fee for this request.

Very truly yours,

STATE OF MARYLAND:

TO WIT:

CITY OF BALTIMORE :

Arthur E. Lundvall, Jr., being duly sworn states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements made are true and correct to the best of his knowledge, information, and belief; and that he was authorized to provide the response on behalf of said Corporation.

My Commission Expires:

My Commission Expires:

AEL/JBC/jes

Enclosure:

Mr. J.R. Miller February 26, 1985 Page 3

cc: D.A. Brune, Esquire
G.F. Trowbridge, Esquire
D.H. Jaffe, NRC
T. Foley, NRC
T. Magette, DNR