

April 17, 1984

Note to: Dave Jaffe

From: J. R. Gray

SUBJECT: SAFETY FINDINGS IN SER FOR CALVERT CLIFFS AMENDMENTS

OELD has been asked to concur in the issuance of an amendment involving six changes to TS for Calvert Cliffs (snubbers, diesel generator fuel oil, DC battery surveillance, off-site electrical power sources, containment isolation valves, control room emergency ventilation). The package generally looks good with one exception--a confusion over the SER safety findings (as opposed to NSHC findings) necessary for issuance of a license amendment.

For each of the specific changes which are the subject of this amendment, the SER contains findings that the change will not significantly increase the probability/consequences of an accident previously considered, will not significantly decrease a safety margin, and will not create a new accident different from any previously evaluated (these findings appear at p. 2 for the snubber changes, at p. 3 for the diesel generator fuel oil storage changes, in the last paragraph on p. 4 for the DC power supply changes, at p. 5 for the changes involving the offsite power source, and at p. 6 for the containment isolation valve changes). These are findings necessary for a NSHC determination and have to do with notice requirements. They are not necessary for issuing a license amendment where no one has requested a hearing and where we have not received comments on the proposed NSHC determination set out in the initial notice. Rather, the findings that must be made in order to issue an amendment are that:

there is reasonable assurance

- (i) that the activities authorized by the amendment can be conducted without endangering the health and safety of the public, and
- (ii) that those activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the public health and safety.

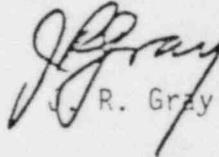
While some of the bases for finding NSHC can also form the basis for our finding that a particular license amendment is acceptable, will not endanger public health and safety etc. and ought to be issued, the standards for issuing an amendment are clearly different from the criteria for finding NSHC (indeed, we occasionally find that a particular proposed license amendment, in fact, will significantly increase the probability/consequences of an accident or create a new accident or significantly reduce a safety

margin and, therefore, involves SHC yet at the same time find that the amendment will not endanger public health and safety etc. and is acceptable). Our concern here is that the Staff may be confusing the NSHC criteria which, quite simply, exist for determining what notice and pre- or post-hearing requirements apply, with the findings necessary to grant a license amendment.

The SER in this case does sufficiently support the findings necessary for issuance of an amendment. I believe, however, that you should modify the language in the SER so as to remove the statements of the NSHC criteria (at p. 2, first full paragraph; p. 3, first full paragraph; p. 4, last paragraph; p. 5, next to last paragraph; p. 6, second, third and fourth paragraphs). For example, modify the last paragraph on p. 4 regarding DC power supply to something like the following:

As indicated above, the proposed changes to TS 3/4.8.2.3 maintain or improve the reliability of the DC power supply. The proposed changes to this TS are, therefore, acceptable.

Please give me a call and let me know of your proposed changes to the above SER paragraphs and, if adequate, I can concur over the phone without the need to have the modified package returned to OELD.


J. R. Gray