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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

November 1, 1985

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

ATTENTION: Mr. Edward J. Butcher, Jr., Acting Chief
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 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 proposed changes to the Technical Specifications.

CHANGE (BG&E FCR No. 85-0089)

Change pages 6-1, 6-2, 6-3, 6-6, 6-7, 6-8, 6-9, 6-11, 6-12, 6-13, 6-14, 6-21, and 6-23 of Unit Nos. 1 and 2 Technical Specifications as shown on the marked up copies attached to this submittal.

DISCUSSION

Effective January 1, 1986, changes to the Baltimore Gas and Electric Company's organization described in Section 6.0 of the Technical Specifications will occur. The major changes are discussed below.

The Vice President-Supply and Vice President-Engineering and Construction positions will be eliminated. A new position of Vice President-Nuclear Energy will be created which will encompass the present responsibilities of the above two eliminated positions with respect to BG&E's nuclear program.

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Reporting to the Vice President-Nuclear Energy will be the four managers listed below.

- o Manager-Nuclear Operations
- o Manager-Nuclear Engineering Services
- o Manager-Quality Assurance and Staff Services
- o Manager-Nuclear Maintenance

The Manager-Nuclear Operations will assume the current responsibilities of the Plant Superintendent with respect to nuclear safety. All references in Section 6.0 of the Technical Specifications to the "Plant Superintendent" have been changed to "Manager-Nuclear Operations." Therefore, the duties and responsibilities concerning overall facility operation addressed in Section 6.0 of the Technical Specifications remain under the purview of a single individual. In order to be consistent with this organizational structure, reports and notifications which are currently required by Section 6.0 to be made to a level of supervision above Plant Superintendent, will in the new organization be made to the Vice President Nuclear Energy. Reporting to the Manager-Nuclear Operations will be the existing positions of General Supervisor-Operations, General Supervisor-Chemistry and General Supervisor-Radiation Safety, and a new position of General Supervisor-Quality Control and Support. This new position will be responsible for emergency planning, on-site fire protection and safety, and quality control within the Operations Department. The requirements which specify which individuals must hold NRC Senior Reactor Operator and Reactor Operator licenses and the basic hierarchy of authority within the Operations section remain unchanged.

The Manager-Nuclear Engineering Services is being established to consolidate all of the engineering support staff into a single department. Engineering functions which are currently performed under the Electric Engineering, Project Management, Nuclear Power, Quality Assurance, and Production Maintenance departments will be relocated to this new organization. The engineering responsibilities will be divided among three General Supervisors in the following major areas:

- 1) Design Engineering,
- 2) Plant and Project Engineering, and
- 3) Licensing and Fuel Management.

The Manager-Quality Assurance and Staff Services will assume the responsibilities of the present Manager-Quality Assurance with exception of the Quality Control function. The mechanical and electrical inspectors associated with Quality Control will be moved to the Nuclear Maintenance Department. This relocation was made to improve inspector efficiency, enhance work performance feedback to the maintenance supervisors, provide greater flexibility for inspector rotation and training and provide the Manager-Nuclear Maintenance, the individual responsible for quality work, with the tools necessary to insure quality standards are achieved. The remainder of the Quality Assurance functions will be the responsibility of the General Supervisor-Quality Assurance. The Manager-Quality Assurance and Staff Services will also have two additional General Supervisors reporting to him. The General Supervisor-Nuclear Training will be responsible for the training functions previously divided between the Nuclear Power Department and the Production Maintenance Department. The General Supervisor-Planning and Support will control administrative service functions within the Nuclear Energy Division.

The Manager-Nuclear Maintenance shall be responsible for the electrical instrument control, and mechanical maintenance/modification crafts and technicians and their associated quality control inspectors. There will be three General Supervisors in this department; one responsible for Electrical and Controls, one for Mechanical Maintenance and one for Quality Control and Support Services.

The Plant Operations and Safety Review Committee will be chaired by the Manager-Nuclear Operations. The position of Principal Engineer-Plant Engineering-Nuclear, General Supervisor-Training and Technical Services, and Principal Engineer-Incore Fuel Management are eliminated as part of the reorganization. They will be replaced as members of the POSRC by the General Supervisor-Licensing and Fuel Management and the General Supervisor-Plant and Project Engineering. The composition of the new POSRC is consistent with that specified in the Standard Technical Specifications.

DETERMINATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

This proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to involve no significant hazards considerations, in that the operation of the facility in accordance with the proposed amendment would not:

- (i) involve a significant increase in the probability or consequences of any accident previously evaluated in the Updated Final Safety Analysis Report (FSAR).

No modification to plant equipment is made by this proposed change. This change is administrative in nature and, therefore, does not affect those accidents evaluated in the FSAR.

- (ii) create the possibility of a new or different type of accident from any accident previously evaluated.

No new or different kind of accidents from those previously evaluated in the Updated FSAR are created by this change.

- (iii) involve a significant reduction in the margin of safety.

This proposed change does not involve any reduction in the margin of safety. The changes will allow sharper focus of top management attention on all aspects of the company's nuclear energy operation.

The change is administrative in nature and is required so that the Technical Specifications will accurately reflect the organizational structure within the Baltimore Gas and Electric Company as of January 1, 1986.

November 1, 1985

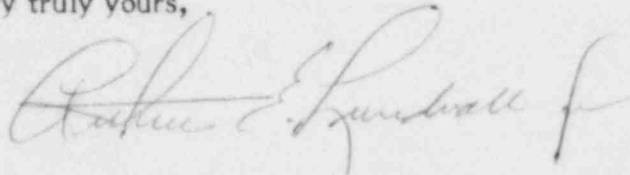
SAFETY COMMITTEE REVIEW

These proposed changes to the Technical Specifications and our determination of significant hazards have been reviewed by our Plant Operations and Off-Site Safety Review Committees, and they have concluded that implementation of these changes will not result in an undue risk to the health and safety of the public.

FEE DETERMINATION

Pursuant to 10 CFR 170.21, we are including BG&E Check No. (1900712) in the amount of \$150.00 to the NRC to cover the application fee for this request.

Very truly yours,



STATE OF MARYLAND :


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TO WIT:

CITY OF BALTIMORE :

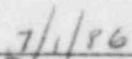
Arthur E. Lundvall, Jr., being duly sworn states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements made are true and correct to the best of his knowledge,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

WITNESS my Hand and Notarial Seal:



Notary Public

My Commission Expires:



Date

AEL/JAT/RMS/dlm

Attachment

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