

LICENSEE: Baltimore Gas and Electric Company

February 10, 1997

FACILITY: Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2

SUBJECT: SUMMARY OF FEBRUARY 4, 1997, MEETING REGARDING CALVERT CLIFFS
IMPROVED TECHNICAL SPECIFICATIONS

On February 4, 1997, the NRC and Baltimore Gas and Electric Company (BGE), the licensee for Calvert Cliffs Nuclear Power Plant, held a meeting in One White Flint North, Rockville, Maryland. The purpose of the meeting was to discuss the improved Technical Specifications (ITSs). A list of meeting attendees is included as Enclosure 1. Enclosure 2 is a copy of the viewgraphs distributed at the meeting.

The Calvert Cliffs conversion submittal eliminates two separate, but almost identical sets of TSs for Units 1 and 2, and replaces them with a single set of TSs applicable to both units. The submittal included a list of Technical Specifications Task Force (TSTF) proposed changes to the licensee's current Technical Specifications (CTS) that are applicable to the submittal. Separate lists of TSTFs not applicable to the submittal and Combustion Engineering Owners Group (CEOG) proposed changes, under consideration by TSTF or CEOG, were also included in the submittal. BGE will prepare a supplement to their submittal to provide plant-specific changes to the ITS and address TSTF and CEOG unapproved changes.

The licensee has scheduled the conversion implementation for August 12, 1997, based on the time required for procedure revisions, development of new programs, training schedules, and timing of the implementation with respect to the next refueling outage. Implementation is also predicated on completion of the NRC review and a Safety Evaluation Report being issued by June 30, 1997. The conversion review schedule is dependent on the resolution of 116 changes to the Calvert Cliffs CTS, 60 of which have not been submitted to the NRC.

Sincerely yours,

/s/

Alexander W. Dromerick, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-317
and 50-318

Enclosures: 1. Meeting Attendees
2. Viewgraphs

cc w/encls: See next page

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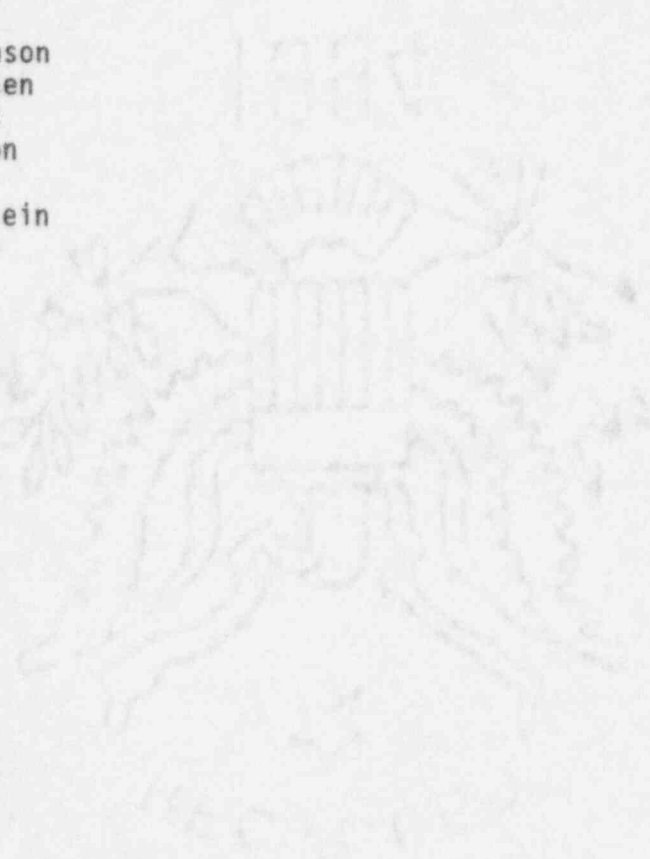
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script, reading "Alexander W. Dromerick", is written above the typed name.

Alexander W. Dromerick, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-317
and 50-318

Enclosures: 1. Meeting Attendees
2. Viewgraphs

cc w/encs: See next page

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Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 and 2

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LIST OF ATTENDEES
BALTIMORE GAS AND ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

February 4, 1997

<u>Name</u>	<u>Organization</u>
Alex Dromerick	NRR/PD 1-1
Dick Clark	NRR/DRPE
Ed Tomlinson	NRR/TSB
John Volkoff	BGE/NRM
Charles E. DeDeaux	BGE/NRM (EXCEL)
Brian O. Mann	BGE
Carl Schulten	NRR/TSB
Chris Grimes	NRR/TSB
Mary Lynn Reardon	NRR/TSB

Enclosure 1

Calvert Cliffs Nuclear Power Plant
Improved Technical Specifications
License Amendment Request

Brian Mann
ITS Conversion Project Manager

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Calvert Cliffs Nuclear Power Plant

Improved Technical Specifications License Amendment Request

Brian Mann

ITS Conversion Project Manager

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brian.d.mann@bge.com



Preparation

- Began in May, 1995
- Submitted December 4, 1996
- 17 volumes
- Approximately 5500 pages



Preparation

- Worked to make it easy to review
 - Followed NEI 96-06 and other guidance regarding format and content
 - Wrote detailed justifications, descriptions, and NSHC discussions
 - Tried to put ourselves in your shoes when structuring the application
 - Example: Section Overview pages
 - Followed NUREG-1432 whenever possible, fixed it when it was broken
- Avoided technical changes.

Significant Changes

- Conversion relatively straightforward.
- Notable changes:
 - Two books to one
 - Accommodation for two-plant site and shared systems
 - Relocation of Fire Protection Requirements
 - CCNPP ESFAS instrumentation was made by Vitro
 - Three loop circulating water system instead of the two loop design in NUREG-1432.



Not CTS, Not ITS Changes

- There were three changes in the submittal that did not exactly match the CTS or the ITS.
 - We addressed the cross-unit power to shared systems in LCO 3.8.1 and the 3.8.1 Required Actions. Without these changes, the new definition of Operable would allow indefinite operation with no emergency power to a CREVS
 - The CCNPP DGs and Fuel Oil Storage Tank design does not match the ITS and the ITS layout of splitting the DGs and FOST LCOs required changes to the CTS requirements. The resulting LCOs are consistent with the ITS requirements and the plant design.



Not CTS, Not ITS Changes

- CCNPP has three Iodine Removal System (IRS) trains instead of the two trains in NUREG-1432. The CTS requirements were changed to be consistent with the ITS philosophy and the ITS was changed to match the plant design.



Travelers

- CCNPP first CE analog plant to submit an ITS conversion.
- Other CE ITS plants (San Onofre and Palo Verde) were digital and newer designs. No CE analog plants were active in the development of NUREG-1432.
- As a result, NUREG-1432 analog sections had never been used or carefully reviewed. As could be expected, many problems were found.
- CE plants have created 116 travelers, 79 of which were created by CCNPP
- In Volume 1, dispositioned all Travelers applicable to NUREG-1432.



Implementation

- CCNPP was the first plant in the industry to perform implementation reviews in parallel with development of the license amendment submittal.
- Reviewers were responsible to identify affected procedures, programs, and training needs a part of their review of the ITS packages.
- This resulted in a more thorough review of the packages and gave us jump start on implementation.
- Licensed operator training started last summer, 1 -2 hours a week every week until implementation.



Implementation

- We are well into our implementation already.
 - All new programs have been drafted and are under review
 - Procedure changes are underway
 - Will most likely implement editorial procedure changes **prior** to implementation and use a cross-reference list to determine the CTS number.

Implementation

- We are working to a schedule to have all implementation activities **completed** by June 30, 1997, which is the requested approval date. We will use the time between June 30 and the implementation date (August 12) to tie up loose ends or we will implement sooner.

Schedule

- Submitted December 4, 1996, requested approval by June 30, 1997 (7 months), for implementation on August 12, 1997.
- What was that date based on?
 - Planning for the March, 1998 RFO starting on September 1, 1997.
 - Quarterly System Schedule (QSS) window for maintenance and Surveillance tests which starts on September 1.
 - New class of licensed operators trained only on ITS.
- Approval by June 30 is very important to BGE and we will work closely with you to achieve that schedule.



Supplement

- December 13, 1996 NRC letter provided additional suggestions for preparing applications. CCNPP had already implemented all but two of those suggestions.
 - February 3, 1997 provided two additional volumes of Unit 1 & 2 CTS markup in CTS order.

Supplement

- We plan to send a second supplement to the amendment in the next few weeks which will:
 - Eliminate two CE topical reports that had been incorporated
 - Expand the justification for a change based on a license amendment.
 - Remove or provide plant-specific justification for some proposed Travelers.
 - Change some Bases statements which subsequent reviews determined may be confusing.



Conclusion

- My job for the next 6 months is to make your job easier in order to get a quick and accurate review.