

CHARLES H. CRUSE
Vice President
Nuclear Energy

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 495-4455



June 9, 1997

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Revision 1 to the License Amendment Request to Convert to the Improved
Technical Specifications (TAC Nos. M97363 and M97364)

REFERENCE: (a) Letter from: C. H. Cruse (BGE) to Mr. A. W. Dromerick (NRC),), dated
December 4, 1996, License Amendment Request to Convert to the
Improved Technical Specifications

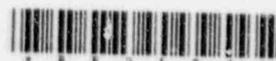
Attached to this letter is Revision 1 to the original license amendment application (Reference a). This revision is provided as discussed in a February 4, 1997 meeting between the NRC and Baltimore Gas and Electric Company staff. These changes result from industry or NRC action on generic changes, as well as issues identified by plant personnel during Improved Technical Specification implementation preparation activities. Changes to the No Significant Hazards Considerations discussions are included where appropriate.

To assist in reviewing this revision, a table describing each of the changes is attached (Attachment 1). All of the material for each change is grouped by change in Attachment (2). Attachment (3) provides the revision by Improved Technical Specification Section for ease of replacing pages in the original amendment request. Page replacement instructions are provided. All changes are marked with revision bars and are labeled Revision 1.

9706190133 970609
PDR ADOCK 05000317
P PDR

100064

Acc 11/11
Requested
Dist



ATTACHMENT (1)

IMPROVED TECHNICAL SPECIFICATIONS, REVISION 1

SUMMARY OF CHANGES

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
June 9, 1997

ATTACHMENT (1)

SUMMARY OF CHANGES

1. It was determined that the Surveillance Frequencies contained in Surveillance Requirements (SRs) 3.7.8.3 and 3.7.12.3 were changed from 18 to 24 months; however, no justification was provided. This item incorporates a justification for these changes.
2. Improved Technical Specification (ITS) SR 3.8.1.14 currently requires verification that automatically bypassed diesel generator (DG) trips are bypassed on a safety injection actuation signal and a simulated loss of offsite power. This has been changed to require verification that automatically bypassed DG trips are automatically bypassed on the required actuation signal. At Calvert Cliffs, the required signals to automatically bypass DG trips differ for different DGs. This information has been placed in the Bases. In addition, clarification is provided which shows that the Current Technical Specification (CTS) Surveillance (4.8.1.1.2.d.3) requires a safety injection actuation signal and an undervoltage signal for the same test.
3. Surveillance Requirement 3.9.2.2 Bases has been modified to replace a statement describing the Channel Calibration for source range monitors. A statement was added which explains why neutron detectors are excluded from Channel Calibration. This replaces a statement about obtaining the detector plateau or preamp discriminator curve, evaluating those curves, and comparing the curves to manufacturer's data. The existing statement was left in by mistake. The explanatory statement added to the SR 3.9.2.2 Bases is the same as the one that already exists in the Bases for SR 3.3.12.3, addressing the same equipment.
4. Bases 3.7.4, Condensate Storage Tank, has been changed to state that the Condensate Storage Tanks contain sufficient cooling water, in the event of a coincident reactor trip, to maintain the plant in Mode 3, instead of shutdown cooling (SDC) entry conditions. The Calvert Cliffs licensing basis ends events with the plants in hot shutdown (Mode 4), not cold shutdown (Mode 5). Therefore, this change is needed for consistency with the design and licensing basis for the Condensate Storage Tank.
5. The alarm setpoint and the measurement range of the containment area high range radiation monitor were not dispositioned in the original submittal. The CTS markup has been corrected and an appropriate Discussion of Changes was added.
6. Current Technical Specification 3.3.3.6, Table 3.3-6, was changed to note that Containment Purge and Exhaust isolation information has been incorporated into ITS 3.3.7, Containment Radiation Signal, instead of being relocated. This change also provides dispositions which address the alarm setpoint and measurement range of the containment area high range radiation monitors.
7. The 5.0 Bases were changed to correct a typographical error (page numbering).
8. Page 11a was added to the CTS markup sections 3.6.1.2 for Units 1 and 2. These pages do not change the ITS, but they were inadvertently omitted from the CTS mark-up.
9. Page 37a was added to CTS markup section 4.9.12 for Unit 2. This page does not change the ITS, but was inadvertently omitted from the CTS mark-up.
10. Various reference marking errors and omissions were found and corrected which do not change ITS, but clarify references on pages.

ATTACHMENT (1)

SUMMARY OF CHANGES

11. Portions of CTS Surveillances 4.7.7.1.d and 4.6.6.1.d that were moved to the Ventilation Filter Testing Program were not marked to identify the appropriate Discussion of Change. The markups are corrected.
12. The Administrative Controls section 5.6.7 was corrected to change the reference to the Post Accident Monitoring (PAM) Instrument specification from Specification 3.3.11 to 3.3.10.
13. An "AND" logical connector was inadvertently omitted from Specification 3.9.4, between Required Actions A.1 and A.2. The ITS and CTS markup has been corrected.
14. The description of the charging pump flow path needed for the charging pumps to perform their Emergency Core Cooling System function has been corrected. The revised description is taken from CTS Limiting Condition for Operation (LCO) 3.1.2.8.
15. An additional pressurizer pressure instrument was added to the list of PAM instruments in ITS 3.3.10, Table 3.3.10-1. The criteria for adding this instrument to the ITS is the same as that for other PAM instruments added to or deleted from the CTS.
16. The word "required" has been added to "charging pump" for SR 3.5.2.4 to clarify when the surveillance is required. Without this clarification, it is not clear whether all charging pumps or only those required for Operability must be tested. This change eliminates this ambiguity.
17. The original ITS submittal deleted a table of distribution system busses from Bases 3.8.9 and referenced the appropriate Updated Final Safety Analysis Report (UFSAR) Table. For ease of use, a Calvert Cliffs-specific table has been placed in the Bases. The list exists in the CTS and the UFSAR, and placing it in the Bases will aid the operator in applying the LCO. In addition, typographical errors in Discussion of Changes, LA.2, and the CTS markup have also been corrected.
18. Improved Technical Specification 3.5.3, Discussion of Changes LA.2 has been changed to correct a CTS reference number.
19. The phrase, "and CEA deviation circuit" has been added to LCO 3.1.4 in the markup of CTS 3.1.3.1. This does not change the ITS or discussions, but clarifies what was changed in the CTS.
20. The words "or containment vent valves" have been removed from the Applicability of LCO 3.3.7, Containment Radiation Signal. The vent valves were added to this LCO by mistake. The containment vent valves are closed in this Mode and, therefore, this specification is not necessary.
21. This change incorporates the CTS requirements regarding the Containment Purge and Exhaust Isolation Valves in Modes 1, 2, 3, and 4, into ITS 3.6.3 Action A, the 3.6.3 Bases, and SR 3.9.3.2. This change is necessary because the Containment Purge and Exhaust System is being modified to use a blind flange in Modes 1, 2, 3, and 4 instead of isolation valves, but the modification for Unit 1 will not be completed until the end of the 1998 refueling outage. These changes will allow the use of the Containment Purge and Exhaust Isolation Valves in Modes 1, 2, 3, and 4, or the blind flanges, whichever is needed to meet the Containment Isolation Valve requirement.

ATTACHMENT (1)

SUMMARY OF CHANGES

22. This change incorporates the justification for a Note added to SR 3.3.7.2. This justification was inadvertently omitted from the original submittal. In addition, the word "driver" is being added to the ITS Note. This term is included in the CTS and NUREG-1432 markups, but was omitted from the draft ITS.
23. This change revises the SR 3.8.3.2 Bases to refer to the 1992 version of ASTM D975 instead of the currently used 1981 version.
24. This change replaces Technical Specifications Task Force (TSTF)-83. The change will revise ITS 3.3.3 to remove the Condition A Note (regarding three Matrix Logic channels inoperable due to a common power source failure de-energizing three matrix power supplies). The Condition would be satisfied without the Note, thereby rendering the Note unnecessary.
25. The changes associated with TSTF-1 have been removed. TSTF-1 incorporated an allowance for inoperable equipment to be returned to service to verify variables to be within limits. TSTF-1 was withdrawn from NRC review by the industry.
26. The changes associated with TSTF-27, Revision 1 (and other related changes) have been added to the submittal. TSTF-27, Revision 1 removes SR 3.4.2.1 and removes the Note for SR 3.4.2.2, eliminating the conditional surveillance of Reactor Coolant System (RCS) temperature and replaces it with a fixed frequency surveillance.
27. This change revises the SR 3.4.12.1 Bases to add, "... or by verifying their discharge valves are locked shut" as an alternate means of verifying that the high pressure safety injection pumps are rendered incapable of injecting into the RCS. This allowance is contained in the CTS and was inadvertently omitted from the Bases.
28. This change replaces the reference to TSTF-65 with a plant-specific justification. TSTF-65 has not yet been approved by the NRC.
29. This change incorporates TSTF-92, Revision 1. Revision 1 deleted the phrase, "... that is not locked, sealed or otherwise secured in position," from SR 3.9.3.2. That phrase was added in Revision 0.
30. TSTF-62, which as approved by the NRC on September 18, 1996, revised the Note to SR 3.4.1.3 from "Only required in Mode 1 with all RCPs running," to "Only required in Mode 1." However, the Applicability of Specification 3.4.1 is Mode 1. Therefore, the Note is unnecessary and confusing. This change eliminates the remaining portion of the Note. A generic change will be written to correct NUREG-1432. Also, a Discussion of Change and No Significant Hazards Consideration for Specification 3.4.1, L.2 is deleted. The associated changes were not included in the submittal, but this information was not deleted.
31. This change to the 3.7.10, 3.7.11, and 3.7.12 Bases modifies the discussions of what constitutes the equipment necessary to meet Operability requirements. This change is made to be consistent with the Calvert Cliffs design.
32. This change implements TSTF-116, Revision 1. TSTF-116, Revision 0 was incorporated in the original submittal. Revision 1 removed the phrase "RCS pressure" from the list of parameters in the

ATTACHMENT (1)

SUMMARY OF CHANGES

Note in both specifications. The phrase stable "RCS pressure" is not consistent with a previous reference in the Bases to performing the associated water inventory balance when the reactor is near operating pressure.

33. This change revises the 3.8.9 Bases to eliminate the requirement that operable vital busses must be energized "from the associated inverter via inverted DC voltage." With this Bases statement, the Conditions of Specification 3.8.9 would be required to be entered whenever an inverter is inoperable, even though the inverter specification, Specification 3.8.7, contains a Note which specifically directs when to enter the Conditions of Specification 3.8.9. Condition 3.8.7.A allows 24 hours for an inoperable inverter, but the existing Bases to LCO 3.8.9 would require entry into Condition 3.8.9.A, which allows only two hours before a plant shutdown is required. This Bases change corrects the proper application of the specifications.
34. This change removes TSTF-145. TSTF-145 provided clarification of the actions to be taken when two containment isolation valves on the same flow path are inoperable by repeating an action contained in the condition for one containment isolation valve inoperable. This is not strictly required under the ITS usage rules, as all applicable conditions are entered. In order to reduce the number of generic changes contained in the Calvert Cliffs submittal, TSTF-145 has been removed.
35. This change removes generic change Combustion Engineering Owners Group (CEOG)-71. CEOG-71 replaced the SR 3.7.1.1 Note "Only required to be performed in Modes 1 and 2," with "Not required to be performed prior to entry into Mode 3." CEOG-71 was rejected by the TSTF because the revised Note was no more clear than the existing Note and the Bases are clear as to the objective. The NUREG-1432, Revision 1 words are being restored.
36. This change implements the changes to CEOG-74 when it became TSTF-171. The changes deleted the new Frequency Note and revised the SR Note.
37. This change incorporates changes made to CEOG-75 for consistency with NUREG-1432 when TSTF-172 was created.
38. This change replaces references to CEOG-76 with a plant-specific justification. CEOG-76 was determined to be below the threshold for a generic change by the Nuclear Energy Institute (NEI) TSTF.
39. This change replaces references to CEOG-77 with a plant-specific justification. CEOG-77 was determined to be below the threshold for a generic change by the TSTF.
40. This change incorporates changes made to CEOG-83 (for consistency with NUREG-1432) when TSTF-177 was created.
41. CEOG-84 proposed the deletion of the Table 3.7.1-2, Main Steam Safety Valve Lift Settings. This change was not approved by the NEI TSTF. CEOG-84 has been removed from the Calvert Cliffs submittal and Table 3.8.1-2 has been restored to the Calvert Cliffs ITS. Calvert Cliffs current licensing basis allowances regarding the lift settings are incorporated into the Calvert Cliffs ITS.
42. CEOG-85 changed the description of the SDC System to be consistent with the requirements in General Design Criteria 34. This change was rejected by the NEI TSTF as being below the threshold

ATTACHMENT (1)

SUMMARY OF CHANGES

for a generic change. Therefore, justification for this change has been incorporated into the Calvert Cliffs submittal.

43. CEOG-86 removed the requirement to declare SDC trains powered by inoperable distribution systems inoperable and "not in operation" because there was a concern that an operator would consider this a requirement to stop using inoperable, but functional, SDC trains. This change was rejected by the NEI TSTF as it was felt that this requirement was needed in order to ensure that the appropriate Conditions in the SDC specification would be entered. Therefore, CEOG-86 has been removed and clarifying statements are being added to the Bases to make clear that SDC subsystems declared inoperable and not in operation may be used if needed.
44. CEOG-88 moved a provision of SR 3.5.1.5 to an SR Note. This change was determined to be inconsistent with the ITS Writers Guide and was withdrawn. Therefore, the NUREG-1432, Revision 1 presentation has been restored.
45. CEOG-93 moved Notes in Specification 3.3.3, Conditions B and C to Action Notes. Upon further review, it was determined that the Notes were not needed because they duplicated LCO 3.0.5. Therefore, CEOG-93 was changed when it was converted to TSTF-181 to remove, rather than move, the Notes. That change has been implemented and is consistent with TSTF-181.
46. This change replaces generic change CEOG-105, which was withdrawn. This change adds "DG Actuation Logic inoperable" to Condition D of Specification 3.3.6, DG Loss of Voltage Starts. Actuation logic for the DGs is part of the LCO, but there is no condition regarding what to do if it is inoperable. In addition, Notes will be added to SR 3.3.6.1 to describe the testing of the Actuation Logic and provide an exclusion which would allow relays associated with plant equipment that cannot be operated during plant operation to only be tested once per 24 months. This is the same Note used for Engineered Safety Features Actuation Signal Actuation Logic because it the same type of equipment. These changes will be put forward as a proposed generic change.
47. This change replaces CEOG-106, which was determined to be plant-specific and withdrawn. Specification 3.6.3, Containment Penetrations, Condition C applies to penetration flow paths with only one containment isolation valve and a closed system. Calvert Cliffs has flow paths in closed systems with more than one isolation valve. This change makes Condition C applicable to penetration flow paths in closed systems with one or more isolation valves. The Notes in Conditions A and B are being changed to clarify that these Conditions do not apply to penetration flow paths that are in closed systems to prevent inappropriate multiple condition entry. This change is needed to make the Calvert Cliffs ITS consistent with the plant design.
48. This change replaces CEOG-110, which was withdrawn. This change simplifies the Azimuthal Power Tilt Actions and makes them similar to other ITS Actions.
49. This change eliminates CEOG-111, which was withdrawn, and restores the NUREG-1432, Revision 1 requirements. In addition, the Completion Time for Action A.1 of LCO 3.1.7 was changed from "15 minutes" to "immediately" for consistency with the Calvert Cliffs accident analysis.

ATTACHMENT (1)

SUMMARY OF CHANGES

50. This change eliminates CEOG-113, which was withdrawn, and incorporates TSTF-27, Revision 1. TSTF-27, Revision 1 eliminates a conditional Surveillance of RCS temperature and replaces it with a fixed frequency Surveillance.
51. This change eliminates CEOG-116 and will restore the NUREG-1432, Revision 1 requirements. CEOG-116 was determined to be inconsistent with the Writers Guide.
52. The Actions when the Containment Purge Isolation Instrumentation is inoperable were determined to be less restrictive instead of more restrictive as described in the original submittal. Therefore Discussion of Change M.4 to Specification 3.3.7 has been deleted and replaced with Discussion of Change L.3. An associated No Significant Hazards Determination has also been provided. The Discussion of Change M.3 for Specification 3.3.7 has been removed, because the more restrictive requirement it describes was not implemented, but the Discussion of Change was left in by mistake.
53. The SR 3.3.1.7 Bases has been revised to change the term, "performed during refueling outages" to "A 24 month surveillance frequency is adequate to ensure proper automatic bypass removal feature operation as described in Reference 4." This is a more accurate description of the intended surveillance frequency, and is similar to a description used in the Bases for SR 3.3.4.3 for similar equipment.
54. A statement has been added to the 3.1.6 Bases specifying that the power dependent insertion limit alarm circuit required to be Operable receives its signal from the reed switch position indication system. This additional phrase was required to clarify which alarm circuit was required to meet the LCO.
55. The phrase, "except that the EAL temporary closure device may not be used in place of an EAL door," has been added to LCO 3.9.4 Note 2.c, 3.9.4 Action A.4, and 3.9.5 Action B.3. These Notes and Actions relate to placing penetrations in the status described in LCO 3.9.3. This change is necessary because these conditions (i.e., a loss of SDC) could result in the pressurization of containment, and the emergency airlock temporary closure device would not provide adequate protection against the escape of radioactive material. This change is consistent with requirements in the CTS.
56. This change incorporates TSTF-82, Revision 1. TSTF-82, Revision 0, was incorporated into the original submittal.
57. This change incorporates TSTF-71, Revision 1. TSTF-71, Revision 0, was incorporated into the original submittal.
58. In Section 1, Discussion of Change, LA.1 is revised to provide more information. This change was described in a Baltimore Gas and Electric Company submittal dated March 27, 1997, responding to NRC questions.
59. This change replaces TSTF-105 with plant-specific justification. This change is consistent with the CTS.
60. In Section 1.1, Mode Definition has been revised to replace the term "bolting" with "closure bolts." This change was described in a Baltimore Gas and Electric Company submittal dated March 27, 1997, responding to NRC questions. In addition, the Improved Standard Technical Specification

ATTACHMENT (1)

SUMMARY OF CHANGES

Table 1.1-1, Note (b) was added back into the Calvert Cliffs ITS as requested by the NRC in their comments on Section 1.0 (Comment 6). The words were modified to be consistent with Calvert Cliffs terminology. Due to this addition, the existing ITS Table 1.1-1 Note (b) has been renumbered as Note (c).

61. Limiting Condition for Operation 3.8.1, Action C.1 has been revised to add the phrase, "... or does not have emergency power" to the criteria for when to declare the Control Room Emergency Ventilation System, Control Room Emergency Temperature System, or the H₂ Analyzer inoperable. If Unit 1 DG No. 1A, (which supports the equipment needed by Unit 2) is inoperable, Unit 1 enters Condition 3.8.1.B and Unit 2 enters Condition 3.9.1.C. If Unit 2 DG No. 2B, (which supports the equipment needed by Unit 1) is subsequently declared inoperable, Unit 2 enters Condition 3.8.1.B and Unit 1 enters Condition 3.8.1.C. However, since the definition of Operable does not require both normal and emergency power, the redundant systems described in Required Action C.1 are not inoperable and operation can continue for both units for 72 hours under Required Action B.4. This is not appropriate, since neither train of the Control Room Emergency Ventilation System, Control Room Emergency Temperature System, or the H₂ Analyzers have emergency power and cannot perform their safety function. Inserting the phrase stated would require both units to enter LCO 3.0.3 in the scenario described.
62. The phrase, "An MSSV is considered inoperable if it fails to open upon demand" has been removed from the Specification 3.7.1 Bases. The broader, more accurate definition of main steam safety valve Operability is already contained in the Bases. Removing the phrase in question clarifies the definition of an Operable main steam safety valve.
63. The Specifications 2.1.2, 3.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.13, 3.4.15, , 3.3.1, 3.7.2, 3.7.12, 3.7.13, 3.7.14, 3.9.3, 3.9.6 Bases are revised to correct Bases statements referring to the Code of Federal Regulations or the Standard Review Plan as the source of the offsite dose or other accident analysis acceptance criteria, and to incorporate a reference the Calvert Cliffs UFSAR. Plant-specific acceptance criteria are approved by the NRC and are stated in the UFSAR. The Code of Federal Regulations contains the maximum allowable limits, not the plant-specific limits which are typically more conservative. Calvert Cliffs is not committed to the Standard Review Plan in most cases and, therefore, the current licensing basis may not be the Standard Review Plan values.
64. A number of corrections and editorial enhancements were made to the Bases. Justification for each change is included in the Discussion of Deviation section. These changes can generally be categorized as: corrections or improvements in the description of systems; the correction of references to the 10 CFR 50, Appendix A, General Design Criteria; elimination of references which were not used and; corrections to make the Improved Standard Technical Specification Bases markup match the ITS Bases.
65. A list of containment penetrations which have closed systems has been added to the 3.6.3, Condition C, Bases. This list was taken from the UFSAR and is intended to assist operators in accurately following the Technical Specifications. A reference to the Standard Review Plan description of closed systems was removed because Calvert Cliffs is not licensed to the Standard Review Plan.

ATTACHMENT (1)

SUMMARY OF CHANGES

66. This change removes TSTF-58, which provided an extension of the Completion Time for the low pressure safety injection subsystem. TSTF-58 is not expected to be approved by the NRC prior to the implementation of the Calvert Cliffs ITS.