



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELIEF FROM INSERVICE TEST REQUIREMENTS
BALTIMORE GAS & ELECTRIC COMPANY
CALVERT CLIFFS NUCLEAR POWER PLANT UNITS 1 AND 2
DOCKET NOS. 50-317 AND 50-318

INTRODUCTION

The Technical Specifications for the Calvert Cliffs Nuclear Power Plant Units 1 and 2 state that the inservice examination and testing of ASME B&PV Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the Code and applicable Addenda as required by 10 CFR 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). The Examination and Testing Program is based upon the requirements of the 1974 Edition with the Addenda through Summer 1975 and the 1977 edition with Addenda through Summer 1978. Certain requirements of this Edition and Addenda of Section XI which are impractical to perform may become the subject of a relief request.

By letter dated September 13, 1985, the licensee requested relief from pump test requirements associated with measurement of flow rates, duration of testing, and observation of lubricant level or pressure during testing. A subsequent letter dated January 13, 1986 withdrew the request for relief associated with measurement of pump flow rates and duration of testing.

Code Requirement

ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition with Addenda through Summer 1975 and the 1977 Edition with Addenda through Summer 1978 Table IWP-3100-1, "Inservice Test Quantities," requires the observation of proper lubricant level or pressure when performing periodic pump testing.

Evaluation

The Calvert Cliffs component cooling water pumps have grease lubricated bearings.

The bearings are greased in accordance with the manufacturer's instructions on a regular preventative maintenance schedule. Accordingly, the requirements of Table IWP-3100-1, for the observation of proper lubricant level or pressure during periodic pump testing are not applicable to the Calvert Cliffs component cooling water pumps. Application of this requirement would require installation of different pumps which use oil as lubricant rather than grease for the bearings.

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Conclusion

Based upon a review of the system design, the basis for relief request, and the licensee's proposed alternate measures, the staff concludes that observation of component cooling water pump lubricant level or pressure during testing is impractical, that licensee's maintenance and lubrication in accord with manufacturer's recommendations gives reasonable assurance of continued pump reliability, and that granting relief where the Code requirements are impractical is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest, considering the burden that could result if they were imposed on the facility. Therefore, in accordance with 10 CFR 50.55a(g)(6)(i), relief should be granted.

Date: March 10, 1986

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