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JOSEPH A. TIERNAN
VICE PRESIDENT
NUCLEAR ENERGY

January 12, 1988

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
Modification to Amendment Request for Containment Purge Valves (TACs
64603 and 64604)

REFERENCE: (a) Letter from Mr. J. A. Tiernan, (BG&E), to NRC Document Control
Desk, dated January 20, 1987, Request for Amendment

Gentlemen:

In Reference (a), we requested a change to the Unit 1 & 2 Technical Specifications for the containment purge isolation valves. This change will relocate the containment purge isolation valve requirements from Technical Specification 3/4 6.4 (Containment Isolation Valves) to Technical Specification 3/4 9.4 (Containment Penetrations). Technical Specification 3/4 9.9 (Containment Purge Valve Isolation System) will be deleted and its associated requirements incorporated into Technical Specification 3/4 9.4. By rearranging the above Technical Specifications that address the containment purge system, inconsistencies and duplication will be eliminated.

In recent discussions, your staff expressed two concerns regarding the above change. Having reviewed the requested change in light of these concerns, we feel that they can be addressed through clarification of Technical Specification 3/4 9.4. A discussion of the concerns and the agreed upon clarification is provided in Enclosure (1). Final copies of all pages associated with the requested change are provided in Enclosure (2).

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

JAT/LSL/dlm

Enclosures

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ENCLOSURE (1)

AMENDMENT REQUEST FOR CONTAINMENT PURGE VALVES

In our letter dated January 20, 1987, Mr. J. A. Tiernan (BG&E) to NRC Document Control Desk, we requested a change to the Unit 1 & 2 Technical Specifications for the containment purge isolation valves. This change will relocate the containment purge isolation valve requirements from Technical Specification 3/4 6.4 (Containment Isolation Valves) to Technical Specification 3/4 9.4 (Containment Penetrations). Technical Specification 3/4 9.9 (Containment Purge Valve Isolation System) will be deleted and its associated requirements incorporated into Technical Specification 3/4 9.4. By rearranging the above Technical Specifications that address the containment purge system, inconsistencies and duplication will be eliminated.

In recent discussions, your staff expressed two concerns regarding the above changes. These concerns and our response to each are provided below.

CONCERN: Surveillance Requirement 4.6.4.1.1 provides specific post-maintenance test requirements for isolation valves listed in Table 3.6-1. By deleting penetration Nos. 13 and 14 and the associated containment purge valves from Table 3.6-1, the specific post-maintenance test requirements for these valves would not be called out in a Surveillance Requirement.

RESPONSE: Article IWV-3200 (Valve Replacement, Repair and Maintenance) of Section XI of the ASME Boiler and Pressure Vessel Code provides retest requirements when a valve or its control system has been replaced, repaired, or has undergone maintenance. Surveillance Requirement 4.0.5 specifically requires testing of ASME Code Class 1, 2, and 3 components in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g). Although requirements for retesting of the containment purge valves would still be in place through Surveillance Requirement 4.0.5, we have added Surveillance Requirement 4.9.4.3 (see Enclosure 2) which is identical to 4.6.4.1.1.

CONCERN: Proposed Technical Specification 3.9.4 could make it possible to open a containment purge valve during CORE ALTERATIONS or movement of irradiated fuel within the containment without having tested the valves for closure upon a containment radiation high Channel A or Channel B test signal.

RESPONSE: When Technical Specification 3.9.4 is applicable, Limiting Condition for Operation (LCO) 3.9.4.c requires that each penetration providing direct access from the containment atmosphere to the outside atmosphere must be either: (1) closed by an isolation valve, blind flange, or manual valve, or (2) be capable of being closed by an OPERABLE automatic containment purge valve. In order to open a containment purge isolation valve when the Technical Specification is applicable, the valve must have been demonstrated OPERABLE or the LCO would be violated. Surveillance requirement 4.9.4.1.b has been clarified to show that testing with Containment Radiation High test signals is included in the determination of an OPERABLE automatic containment purge valve (see Enclosure 2).