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December 4, 1996

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
License Amendment Request; Conversion of the Calvert Cliffs Units 1 and 2
Technical Specifications to the Improved Standard Technical Specifications,
NUREG-1432

Pursuant to 10 CFR 50.90, the Baltimore Gas and Electric Company hereby requests an Amendment to Operating License Nos. DPR-53 and DPR-69 by the incorporation of the changes described below into the Technical Specifications for Calvert Cliffs Unit Nos. 1 and 2. The proposed amendment will revise the Calvert Cliffs Unit 1 and Unit 2 Technical Specifications to be generally consistent with NUREG-1432, Revision 1, "Standard Technical Specifications for Combustion Engineering Plants." All applicable Generic Changes to NUREG-1432, Revision 1, available as of October 30, 1996, have been incorporated.

The proposed amendment will eliminate the two separate, but almost identical, sets of Technical Specifications for Calvert Cliffs Units 1 and 2, and replace them with a single set of Technical Specifications applicable to both units. Throughout the application, differences between the existing Units 1 and 2 Technical Specifications are noted, and the combination of the Technical Specifications is described and justified.

This submittal follows the guidance in Nuclear Energy Institute's (NEI) NEI-96-06, Improved Technical Specifications Conversion Guidance, dated August 1996, and NRC Administrative Letter 96-04, Efficient Adoption of Improved Standard Technical Specifications, dated October 9, 1996.

As part of this license amendment request, Calvert Cliffs has relocated Fire Protection requirements regarding fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing from the Technical Specifications, in accordance with Generic Letters 88-10, Implementation of Fire Protection Requirements, and 88-12, Removal of Fire Protection Requirements from Technical Specifications. Baltimore Gas and Electric Company will add the Fire Protection Program described in the Generic

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Letters to the Calvert Cliffs Updated Final Safety Analysis Report prior to issuance of the Improved Technical Specifications license amendment. This change is consistent with NUREG-1432, Revision 1.

The detailed description and justification for the proposed Technical Specification amendment consists of 15 volumes. The submittal is designed to facilitate distribution of individual sections for review to the appropriate organizational units within the NRC. To facilitate the NRC's review, additional copies will be provided if needed.

A detailed description of the contents and organization of the 15 volumes is included as Attachments 1, 2, and 3 of this letter, and are described below:

- Attachment 1, Calvert Cliffs Units 1 and 2 Improved Technical Specification (ITS) Submittal Synopsis, describes the organization and content of the submittal, and the organization and content of each of the volumes included in the submittal. This Attachment is designed to facilitate distribution of each section within the NRC, and to familiarize reviewers with the content and organization of each section.
- Attachment 2, Outstanding Amendments and Generic Changes, describes and provides the status of pending changes to the Current Technical Specifications (CTS) that are incorporated into this conversion amendment request, a description of generic topical reports that have been incorporated, and a list of the proposed generic changes to NUREG-1432, Revision 1, that are incorporated into this amendment request. This information is intended to facilitate Baltimore Gas and Electric Company and NRC document control during the review and approval process.
- Attachment 3, Significant Deviations from NUREG-1432 That are Also Changes to the Calvert Cliffs CTS, describes items in the proposed ITS that fall under the NEI 96-06 category of "Not ITS, Not CTS." In converting to the ITS, there were some cases in which the NUREG-1432 presentation was not appropriate for the Calvert Cliffs design, and the current Technical Specification presentation was not consistent with the NUREG-1432 use and application rules, or was not appropriate for the combined Unit 1 and Unit 2 Improved Technical Specifications. These proposed changes are required for a successful conversion. None of the changes are considered "Beyond Scope" as described in NEI 96-06 and Administrative Letter 96-04.

The implementation of the Calvert Cliffs ITS will require the performance of a number of new Surveillance Requirements. Baltimore Gas and Electric Company intends to treat these new requirements as being "met" at the time of implementation of the ITS, with the first performance scheduled to be completed within the required Frequency from the implementation date.

Current Technical Specifications which do not meet the criteria given in 10 CFR 50.36(2)(c)(ii) are proposed to be relocated to a licensee-controlled Technical Requirements Manual (TRM). The TRM will be incorporated by reference into the Calvert Cliffs Updated Final Safety Analysis Report prior to implementation of the Improved Technical Specifications, and changes to the TRM will be evaluated under 10 CFR 50.59.

Implementation of the proposed amendment is currently scheduled for August 12, 1997. This date is based on the time required for procedure revisions, including the development of the new programs,

training schedules for both licensed and non-licensed personnel, and the timing of the implementation with respect to the next refueling outage. This implementation date is also predicated on the NRC review being completed, and a Safety Evaluation Report being issued, by June 30, 1997.

The evaluations contained in individual sections of this proposed amendment concluded that the proposed changes to the Calvert Cliffs Units 1 and 2 Technical Specifications do not involve a significant hazards consideration. In addition, the proposed changes do not create a potential for a significant change in the types, or a significant increase in the amount, of any effluent that may be released offsite, nor do the changes involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the changes meet the eligibility criteria for a categorical exclusion as set forth in 10 CFR 51.22(c)(9). Therefore, in accordance with 10 CFR 51.22(b), an environmental assessment of the changes is not required.

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

Baltimore Gas and Electric Company requests a meeting at your earliest convenience to discuss a review schedule and the content of the submittal package. Any questions regarding this proposed amendment should be directed to Mr. Brian D. Mann at (410) 495-6517.

