



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NOS. 82 AND 65 TO

FACILITY OPERATING LICENSES NOS. DPR-53 AND DPR-69

BALTIMORE GAS AND ELECTRIC COMPANY

CALVERT CLIFFS NUCLEAR POWER PLANT UNIT NOS. 1 & 2

DOCKET NOS. 50-317 AND 50-318

Introduction

By application for license amendment dated February 24, 1983, Baltimore Gas and Electric Company (BG&E) requested changes to the Technical Specifications (TS) for Calvert Cliffs Units 1 and 2. The proposed changes to the TS would (1) correct typographical errors as they appear in TS 4.7.7.1, "ECCS Pump Room Exhaust Air Filtration System" and TS Bases 3/4.4.2, "Safety Valves", (2) establish TS 6.8.1.g. to require procedures limiting overtime for personnel involved in safety related activities, (3) change TS 3/4.7.2, "Steam Generator Pressure/Temperature Limitation" and associated Bases to increase the steam generator minimum pressurization temperature (MPT), (4) delete a requirement on the pressurizer safety valve acoustic flow monitor, and (5) change the administrative requirements of Section 6 of the TS to provide for yearly audit and review of the safeguards contingency plan and the facility emergency plan, respectively.

In the course of reviewing the proposed TS submitted with the February 24, 1983 application, the staff found it necessary to make certain changes in the TS. These changes were discussed with and agreed to by BG&E.

Discussion and Evaluation

The February 24, 1983 application identifies two typographical errors in the TS and proposes the corrective wording. The first error appears in TS 4.7.7.1 in which the flow rate for ECCS pump room exhaust air filter bank testing is given as 2000 cfm  $\pm$  10%. BG&E has indicated that this value should be 3000 cfm  $\pm$  10%. A review of the TS indicates that the required system flow rate is shown in TS 4.7.7.1.b.4 as 3000 cfm  $\pm$  10%. This value is in agreement with Final Safety Analysis Report (FSAR) data shown in Table 9-19. Accordingly, the flow rate presently contained in TS 4.7.7.1, 2000 cfm  $\pm$  10%, is in error and should be changed to 3000 cfm  $\pm$  10%.

The second typographical error identified by BG&E appears in the Bases for TS 3/4.4.2. The Bases identifies the pressurizer safety valve relief flow rate as  $7.6 \times 10^5$  lbs per hour. BG&E has indicated that the correct value should be "approximately  $3 \times 10^5$  lbs per hour." This value is consistent with information contained in the Nuclear Steam Supply System (NSSS) design specifications. A review of the FSAR Table 4-19 indicates that two pressurizer safety valves are installed with relief flow rates of  $2.96 \times 10^5$  and  $3.02 \times 10^5$

lbs per hour. These values can be described as "approximately  $3 \times 10^5$  lbs per hour." Accordingly, the present TS bases value for the pressurizer safety valve relief rate,  $7.6 \times 10^5$  lbs per hour, should be changed to "approximately  $3 \times 10^5$  lbs per hour."

A second area of TS change involves the addition of an administrative TS requirement to establish written procedures to control "... the amount of overtime worked by plant staff members performing safety related functions" in accordance with NRC Generic Letter 82-12. Generic Letter 82-12 was issued on June 15, 1982 and contains the NRC position on limiting overtime for personnel involved in safety related activities. The limiting of overtime for personnel involved in safety related activities was established as TMI Action Item I.A.1.3.1 in NUREG-0737. A review of the proposed TS, as modified by the NRC and agreed to by BG&E, indicates that it is in agreement with the wording proposed by the NRC in its Generic Letter 82-16. This generic letter was issued on September 20, 1982 to licensees of Pressurized Water Reactors to provide guidance on acceptable wording for TS related to TMI Action Items. We conclude that the proposed wording of TS 6.8.1.g is in accordance with the NRC guidance contained in Generic Letter 82-16 and is therefore acceptable.

The third area of TS change involves the minimum pressurization temperature (MPT) for the steam generators. The establishment of an MPT assures that the steam generators will behave in a ductile fashion in response to transient pressure conditions. The MPT is presently specified as greater than  $70^{\circ}\text{F}$  at steam generator pressures greater than 200 psig per TS 3/4.7.2. BG&E has proposed that the MPT be increased to greater than  $80^{\circ}\text{F}$  for Unit 1 and greater than  $90^{\circ}\text{F}$  for Unit 2, for steam generator pressures greater than 200 psig. The proposed increase in MPT is based upon recommendations by the NSSS supplier. MPTs are established in recognition that the primary system materials undergo a transition from ductile to brittle behavior at low temperatures. Avoidance of operation of the steam generators in a temperature range where brittle failure could occur is important to prevent sudden failure of the reactor coolant pressure boundary represented by the steam generator tubes. Since brittle failure is a low temperature effect, the raising of the MPT is conservative in that it provides additional margin to the temperature range where brittle failure could occur. Accordingly, the increase in MPT as reflected in revised TS 3/4.7.2 and the associated Bases is acceptable.

A change to TS 3.3.3.6 is considered herein for deletion of a footnote in TS Table 3.3-10. This footnote would have allowed the inoperability of the acoustic flow monitor for Unit 1 Pressurizer Safety Valve PV-201 until June 1, 1981. Deletion of this relief is appropriate since the applicable date has passed. This is an administrative action with no safety significance and, accordingly, is acceptable.

The final TS change considered herein relates to the review and audit of emergency preparedness and safeguards contingency plans. On October 1, 1982 the NRC issued Generic Letter 82-17 which informed licensees and applicants of the requirements of 10 CFR 50.54(t) for an annual review of the facility emergency plan; a request was made for incorporation of this requirement in the TS. On October 30, 1982 the NRC issued Generic Letter 82-23 which informed licensees and applicants of the requirements of 10 CFR 73.40(d) for an annual audit of the safeguards contingency plan. A request was also made in Generic Letter 82-23 for incorporation of a requirement in the TS for annual audit of the safeguards contingency plan. BG&E has agreed to appropriate changes to TS 6.5.2.8 which would make the annual audit and review of the safeguards contingency plan (and implementing procedures) and the emergency plan (and implementing procedures) a responsibility of the BG&E Off-Site Review Committee (OSSRC). In this regard, we recognize the differences between a "review" and an "audit" as contained in ANSI Standard N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." An audit is defined in ANSI N18.7 as a methodical examination to determine conformance to requirements; a review represents a critical examination and evaluation to determine the adequacy of the requirements. We find the proposed changes to the TS acceptable since they meet the requirements contained in Generic Letters 82-17 and 82-23.

#### Environmental Consideration

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

#### Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated, do not create the possibility of an accident of a type different from any evaluated previously, and do not involve a significant reduction in a margin of safety, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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