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

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September 25, 1998

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 Response to Request for Additional Information for the Review of the Calvert Cliffs Nuclear Power Plant, Units 1 & 2, Integrated Plant Assessment Report for the Radiation Monitoring System

**REFERENCES**:

809300123

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- (a) Letter from Mr. C. H. Cruse (BGE) to NRC Document Control Desk, dated May 23, 1997, "Request for Review and Approval of System and Commodity Reports for License Renewal"
- (b) Letter from Mr. D. L. Solorio (NRC) to Mr. C. H. Cruse (BGE), dated August 6, 1998, "Request for Additional Information for the Review of the Calvert Cliffs Nuclear Power Plant, Units 1 & 2, Integrated Plant Assessment Report for Radiation Monitoring System"

Reference (a) forwarded four Baltimore Gas and Electric Company system and commodity reports for license renewal. Reference (b) forwarded questions from NRC staff on one of those four reports, the Integrated Plant Assessment Report for the Radiation Monitoring System. Attachment (!) provides our responses to the questions contained in Reference (b).

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

Very truly yours

Markop Prine

#### STATE OF MARYLAND : TO WIT: COUNTY OF CALVERT

I, Charles H. Cruse, being duly sworn, state that I am Vice President, Nuclear Energy Division, Baltimore Gas and Electric Company (BGE), and that I am duly authorized to execute and file this response on behalf of BGE. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other BGE employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Charles Planse

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of <u>Calvert</u>, this <u>25</u> day of <u>September</u>, 1998.

WITNESS my Hand and Notarial Seal:

Michelle D. Hall Notary Public

My Commission Expires:

February 1, 2002

CHC/KRE/dlm

Attachment: (1) Response to Request for Additional Information; Integrated Plant Assessment Report for the Radiation Monitoring System

cc: R. S. Fleishman, Esquire J. E. Silberg, Esquire S. S. Bajwa, NRC A. W. Dromerick, NRC H. J. Miller, NRC

C. I. Grimes, NRC D. L. Solorio, NRC Resident Inspector, NRC R. I. McLean, DNR J. H. Walter, PSC

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION;** 

INTEGRATED PLANT ASSESSMENT REPORT FOR THE RADIATION MONITORING

SYSTEM

# RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION; INTEGRATED PLANT ASSESSMENT REPORT FOR THE RADIATION MONITORING SYSTEM

# NRC Question No. 1

In Section 5.14.1.1, System Level Scoping, the process Radiation Monitoring System (RMS) includes the following radiation monitors: plant main vent, waste gas discharge, liquid waste processing discharge, condenser air removal discharge, steam generator blowdown tank discharge, steam generator blowdown recovery, and atmosphere (other than the control room ventilation). In Section 5.14.1.2, Component Level Scoping, all of the above radiation monitors are excluded for the consideration of component level scoping. Provide the justification for eliminating each of the above radiation monitors from the scope of the license renewal.

# **BGE Response**

The radiation monitors that monitor the plant main vent (other than the wide range noble gas monitors), waste gas discharge, liquid waste processing discharge, condenser air removal discharge, steam generator blowdown tank discharge, steam generator blowdown recovery, and atmosphere (other than the control room ventilation and the containment isolation valves to the containment atmosphere monitors) are non-safety-related and do not perform any of the system intended functions based on 10 CFR 54.4(a)(1), (2), (3) and (b). Note that while the non-safety-related plant main vents radiation monitors are not in scope, the safety-related wide range effluent gas radiation monitors that monitor the plant main vents are in scope (see Figure 5.14-3 on page 5.14-6). Note also that while the non-safety-related containment atmosphere radiation monitors are not in scope, the containment penetration, including the safety-related containment isolation valves, are in scope (see Figure 5.14-7).

# NRC Question No. 2

Section 5.14.1.2 states that the shaded areas of Figure 5.14-1 through 5.14-8 indicate which portions of the RMS are within the scope of license renewal. Figure 5.14-1 through 5.14-8 do not have sufficient illustration to explain which components the shaded areas represent. Provide a legend for Figures 5.14-1 through 5.14-8 that defines the components listed within them. Additionally, provide definitions for those acronyms used in these figures that are not already defined in other parts of your license application.

## **BGE Response**

Included below are legends for the acronyms and symbols used in Figures 5.14-1 through 5.14-8.

Acronym Legend:

- AE Analysis lement (Sensing)
- DL Data Log i oint
- E/E Voltage to Voltage Signal Converter
- E/I Voltage to Current Signal Converter
- EFF Effluent
- FAI Fails As Is
- FC Fails Closed
- FIS Flow Indication Switch
- FO Fails Open
- FE Flow Element (Sensing)
- FI Flow Indicator (Display)
- FT Flow Transmitter

- NO Normally Open
- PDT Pressure Differential Transmitter
- PI Pressure Indicator (Display)
- RE Radiation Element (Sensing)
- RI Radiation Indicator (Display)
- RIC Radiation Indicator (Controller)
- RR Radiation Recorder (Display)
- SIAS Satety Injection Actuation Signal
- SV Solenoid Valve
- TC Temperature Controller
- TE Element (Sensing)
- XI Sample Timer (Display)



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# RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION; INTEGRATED PLANT ASSESSMENT REPORT FOR THE RADIATION MONITORING SYSTEM

Comparison of the second s	T	
1 - RE - 5317A - Radiation Element	F - Filter	- Microprocessor

## NRC Question No. 3

Are there any parts of the systems, structures, and components that are inaccessible for inspection? If so, describe what aging management program will be relied upon to maintain the integrity of the inaccessible areas. If the aging management program for the inaccessible areas is an evaluation of the inaccessible areas based on conditions found in surrounding accessible areas, please provide information to show that conditions would exist in accessible areas that would indicate the presence of or result in degradation to such inaccessible areas. If different aging effects or aging management techniques are needed for the inaccessible areas, please provide a summary to address the following elements for the inaccessible areas: (1) Preventive actions that will mitigate or prevent aging degradation; (2) Parameters monitored or inspected relative to degradation of specific structure and component intended functions; (3) Detection of aging effects before loss of structure and component intended functions; (4) Monitoring, trending , inspection, testing frequency, and sample size to ensure timely detection of aging effects and corrective actions; (5) Acceptance criteria to ensure structure and component intended functions; (6) Operating experience that provides objective evidence to demonstrate that the effects of aging will be adequately managed.

# **BGE Response**

All parts of the RMS at Calvert Cliffs that are within scope for License Renewal are accessible for testing and inspection, as needed, for managing the plaus aging effects.