



UNITED STATES  
NUCLEAR REGULATOR / COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 113 AND 96

TO FACILITY OPERATING LICENSE NOS. DPR-53 AND DPR-69

BALTIMORE GAS AND ELECTRIC COMPANY

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-317 AND 50-318

Introduction

By application for license amendment dated September 9, 1985, as supplemented by letter dated October 29, 1985, 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 delete requirements for the post-accident sampling systems (PASS) in TS 3/4.7.13 and the post-accident main vent iodine and particulate monitors in TS Tables 3.3-6, "Radiation Monitoring Instrumentation," and Table 4.3-3, "Radiation Monitoring Instrumentation Surveillance Requirements." A new TS, 6.15, "Post-Accident Sampling," would address the requirements for the PASS and the post-accident main vent iodine and particulate monitors.

Discussion and Evaluation

On November 1, 1983, the NRC issued Generic Letter No. 83-37 (GL 83-37) to all pressurized water reactor licensees. This letter contained guidance concerning TS which the NRC believed to be appropriate as addressed in NUREG-0737, "Clarification of TMI Action Plan Requirements." The licensee responded, in part, to GL 83-37 via their application for license amendments dated September 9, 1985, as supplemented by letter dated October 29, 1985, regarding the PASS and the post-accident main vent iodine and particulate monitors.

The proposed TS submitted by BG&E meet all NRC objectives for this requirement, as contained in GL 83-37, in that it requires the licensee to establish a program with the following elements for the PASS and post-accident main vent iodine and particulate monitors:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

The existing requirements for PASS and post-accident main vent iodine and particulate monitors in TS 3/4.7.13 and TS Tables 3.3-6 and 4.3-3 would be deleted in that these requirements would be unnecessary.

Although TS 3.7.13 and TS Table 3.3-6 contain Limiting Conditions for Operation (LCO) for the subject equipment, these conditions were never intended to be nor were they ever restricting with regard to reactor operation. In the event that the subject equipment was inoperable, the LCOs required alternate sampling methods to be available. This requirement is retained and is implicit in the "program" requirements of proposed TS 6.15. The remaining LCO requirement of TS 3.7.13 and TS Table 3.3-6 required a special report to be submitted to the NRC when the subject equipment became inoperable for an extended period. This requirement has no direct impact on the availability of the subject equipment since it can be fulfilled without actually returning the equipment to operation. With regard to the surveillance requirements of TS 4.7.13 and TS Table 4.3-3, an equivalent level of surveillance would be transferred to the "maintenance" provision of proposed TS 6.15.

Based upon the above, the staff concludes that the major provisions of TS 3/4.7.13 and TS Tables 3.3-6 and 4.3-3 would be incorporated in proposed TS 6.15. Moreover, TS 6.15 has additional requirements which are important with regard to the subject equipment. Proposed TS 6.15 requires "training of personnel" and "procedures for sampling and analysis" which provide the only periodic experience for use of this equipment since there is no function for this equipment during expected plant operating conditions.

Since, overall, no decrease in TS requirements would be associated with the proposed TS change and the proposed changes satisfy the criteria of GL 83-37, the staff finds the proposed changes to be acceptable.

#### Environmental Consideration

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(9). These amendments also involve changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, with respect to these items, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(10). Pursuant to 10 CFR §51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

Conclusion

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) 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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