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Vice President  
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Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, Maryland 20657  
410 495-4455



January 28, 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  
Revision 12 to the License Amendment Request to Convert to the Improved  
Technical Specifications (TAC Nos. M97363 and M97364)

**REFERENCE:** (a) Letter from Mr. C. H. Cruse (BGE) to Mr. A. W. Dromerick (NRC),  
dated December 4, 1996, License Amendment Request to Convert to the  
Improved Technical Specifications (TAC Nos. M97363 and M97364)

Reference (a) was the initial application to convert to the Improved Standard Technical Specifications. Revisions to Reference (a) have been submitted in response to Nuclear Regulatory Commission questions and comments. Additionally, discussions have been held between the Nuclear Regulatory Commission Staff and Baltimore Gas and Electric Company personnel to clarify the information contained in the application and revisions. As a result of these discussions, additional changes are being made to the initial application. This letter provides Revision 12 to Reference (a).

Attachment (1) contains revised pages for the tables submitted previously in response to various requests for additional information. Attachment (2) provides a minor revision to the Summary of Changes provided for Revision 1. Attachment (3) contains Revision 12 by Improved Technical Specifications section, for ease of replacing pages in the original amendment request. Page replacement instructions are provided. All changes are marked with revision bars and labeled Revision 12.

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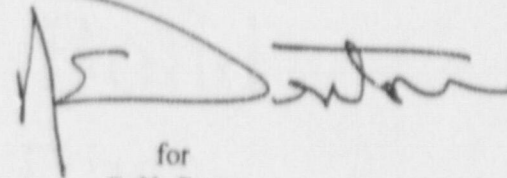


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Should you have questions regarding this matter, we will be pleased to discuss them with you

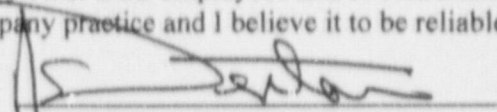
Very truly yours,



for  
C. H. Cruse  
Vice President - Nuclear Energy

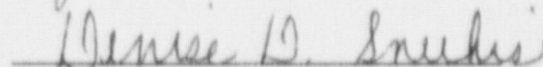
STATE OF MARYLAND :  
: TO WIT:  
COUNTY OF CALVERT :

I, R. E. Denton, being duly sworn, state that I am Senior Vice President - Generation, Baltimore Gas and Electric Company (BGE), and that I am duly authorized to execute and file this License Amendment Request 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.



Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of Calvert, this 28th day of January 1998.

WITNESS my Hand and Notarial Seal:

  
Notary Public

My Commission Expires:

2/1/02  
Date

CHC/PSF/bjd

Attachments: (1) Revision to Responses to Request for Additional Information  
(2) Revision to Summary of Changes  
(3) Revision by ITS Section

cc: M. L. Reardon, NRC

(With Attachment 2 only)

R. S. Fleishman, Esquire  
J. E. Silberg, Esquire  
Director, Project Directorate I-1, NRC  
A. W. Dromerick, NRC

H. J. Miller, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR  
J. H. Walter, PSC

ATTACHMENT (1)

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**IMPROVED TECHNICAL SPECIFICATIONS, REVISION 12  
REVISION TO RESPONSES TO REQUEST FOR ADDITIONAL  
INFORMATION**

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# ATTACHMENT (1)

## RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.7

3.7.11	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.11-4	L3 JFD 1 Bases JFD 1	CTS 4.9.12.d.2 ITS SR 3.7.11.3 and Associated Bases	CTS Surveillance 4.9.12.d.2 requires maintaining the SFPEVS measurable negative pressure relative to the outside atmosphere once per 18 months. ITS SR 3.7.11.3 requires maintaining the SFPEVS measurable negative pressure relative to the outside atmosphere once per 24 months. The change from 18 months to 24 months is justified based on operating history (L3) and using a generalized justification (JFD 1/Bases JFD 1) that incorporates CCNPP-specific information into the bracketed information. The latter justification used is wrong. The change in frequency is unacceptable and is beyond the scope of review for this conversion.	5/30/97		Delete this change.
<b>CCNPP Response:</b> This change in surveillance frequency from 18 to 24 months is similar to other changes approved as part of ITS submittals. This is one of four such changes discussed with the Calvert Cliffs Project Manager and turned over to the appropriate technical branch. DOC L3 for ITS 3.7.11 was revised to provide additional justification as part of Revision 1 to the ITS Amendment Request dated June 9, 1997.						
3.7.11-5	JFD 1 Bases JFD 1	STS SR 3.7.14.5 ITS B3 7.11 Bases - BACKGROUND	STS SR 3.7.14.5 verbiage that each FBACS filter bypass damper can be opened. ITS B3 7.10 Bases-BACKGROUND states that during normal operation the charcoal adsorbers are bypassed and it is implied that during emergency operation the SFPEVS dampers are realigned to initiate filtration. STS SR 3.7.14.5 is deleted from ITS 3.7.11 based on a general justification on items not consistent with the CCNPP design. The justification in this case are the wrong justifications since the design does include bypass dampers.	5/30/97		Either include STS SR 3.7.14.5 in the ITS or provide additional discussion and justification based on current licensing basis, system design, or operational constraints to justify the deletion of STS SR 3.7.14.5.
<b>CCNPP Response:</b> The STS surveillance was written for designs that have a bypass line to provide cooling to a loaded filter train that has been shut down post-accident. The CCNPP design does not include this feature. This change is based on the surveillance not being in CTS and the STS surveillance being in brackets. Therefore, while Discussion of Deviation 1 does not provide specific details, it is accurate. This system is operated manually and the ITS verifies system operation during fuel movement. No additional surveillances are necessary.						

# ATTACHMENT (1)

## RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.7

3.7.12	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.12-2	JFD 1 Bases JFD 1	CTS 4.6.6.1.d.2 ITS SR 3.7.12.3 B3.7.12 Bases SR 3.7.12.3	CTS 4.6.6.1.d.2 requires verifying at least once per 18 months that PREVS starts on a Containment Isolation Test signal. ITS SR 3.7.12.3 requires verifying that each PREVS trains actuates on an actual or simulated actuation signal once per 24 months. The change from 18 months to 24 months is justified in the ITS Based on a generalized justification (JFD1/Bases JFD 1) that incorporates CCNPP-specific information into the bracketed information. This justification is wrong. In addition, the CTS markup does not show this change or provide a justification for it. The change in frequency is unacceptable and is beyond the scope of review for this conversion.	5/30/97		Delete this change.

### CCNPP Response:

DOC L1 was provided to justify the change from a frequency of 18 to 24 months. Frequency extensions from 18 to 24 months have been included as within the scope of the ITS conversion, and this was a change discussed with the NRC Project Manager for Calvert Cliffs.

3.7.12-3	JFD 1 Bases JFD 1	STS SR 3.7.15.5 ITS B3.7.12 Bases- BACKGROUND	STS SR 3.7.15.5 verifies that each PREACS filter bypass damper can be opened. ITS B3.7.12 Bases-BACKGROUND states that "During emergency operations, the PREVS dampers are realigned..." STS SR 3.7.14.5 is deleted from ITS 3.7.12 based on a general justification on items not consistent with the CCNPP design. The justifications in this case are the wrong justifications, since the design does include bypass dampers.	5/30/97		Either include STS SR 3.7.15.5 in the ITS or provide additional discussion and justification based on current licensing basis, system design or operational constraints to justify the deletion of STS SR 3.7.15.5.
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### CCNPP Response:

The STS surveillance was written for designs which have a bypass line to provide cooling to a loaded filter train that has been shutdown post-accident. The CCNPP design does not include this feature. This change is based on the surveillance not being in CTS and the STS surveillance being in brackets. Therefore, while DOD 1 does not provide specific details, it is accurate, this system is operated manually and the ITS verifies system operation during fuel movement. No additional surveillances are necessary.

**ATTACHMENT (2)**

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**IMPROVED TECHNICAL SPECIFICATIONS, REVISION 12**  
**REVISION TO SUMMARY OF CHANGES**

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## ATTACHMENT (I)

### SUMMARY OF CHANGES

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22. This change incorporates the justification for a Note added to SR 3.3.7.2. This justification was inadvertently omitted from the original submittal. In addition, the word "driver" is being added to the ITS Note. This term is included in the CTS and NUREG-1432 markups, but was omitted from the draft ITS.
23. This change revises the SR 3.8.3.2 Bases to refer to the 1992 version of ASTM D975 instead of the currently used 1981 version.
24. This change replaces Technical Specifications Task Force (TSTF)-83. The change will revise ITS 3.3.3 to remove the Condition A Note (regarding three Matrix Logic channels inoperable due to a common power source failure de-energizing three matrix power supplies). The Condition would be satisfied without the Note, thereby rendering the Note unnecessary.
25. The changes associated with TSTF-1 have been removed. TSTF-1 incorporated an allowance for inoperable equipment to be returned to service to verify variables to be within limits. TSTF-1 was withdrawn from NRC review by the industry.
26. The changes associated with TSTF-27, Revision 1 (and other related changes) have been added to the submittal. TSTF-27, Revision 1 removes SR 3.4.2.1 and removes the Note for SR 3.4.2.2, eliminating the conditional surveillance of Reactor Coolant System (RCS) temperature and replaces it with a fixed frequency surveillance.
27. This change revises the SR 3.4.12.1 Bases to add, "... or by verifying their discharge valves are locked shut" as an alternate means of verifying that the high pressure safety injection pumps are rendered incapable of injecting into the RCS. This allowance is contained in the CTS and was inadvertently omitted from the Bases.
28. This change replaces the reference to TSTF-65 with a plant-specific justification. TSTF-65 has not yet been approved by the NRC.
29. This change incorporates TSTF-92, Revision 1. Revision 1 deleted the phrase, "... that is not locked, sealed or otherwise secured in position," from SR 3.9.3.2. That phrase was added in Revision 0.
30. TSTF-62, which as approved by the NRC on September 18, 1996, revised the Note to SR 3.4.1.3 from "Only required in Mode 1 with all RCPs running," to "Only required in Mode 1." However, the Applicability of Specification 3.4.1 is Mode 1. Therefore, the Note is unnecessary and confusing. This change eliminates the remaining portion of the Note. A generic change will be written to correct NUREG-1432. Also, a Discussion of Change and No Significant Hazards Consideration for Specification 3.4.1, L.2 is deleted. The associated changes were not included in the submittal, but this information was not deleted.
31. This change to the 3.7.10 and 3.7.11 Bases modifies the discussions of what constitutes the equipment necessary to meet Operability requirements. This change is made to be consistent with the Calvert Cliffs design.

## ATTACHMENT (2)

### AMENDMENT REVISION BY CHANGE

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31. This change to the 3.7.10 and 3.7.11 Bases modifies the discussions of what constitutes the equipment necessary to meet Operability requirements. This change is made to be consistent with the Calvert Cliffs design.