CHARLES H. CRUSE
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Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 495-4455

BGE

October 23, 1997

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 9 to the License Amendment Request to Convert to the Improved Technical Specifications (TAC Nos. M97363 and M97364)

REFERENCE: (a) Letter from A. W. Dromerick (NRC) to C. H. Cruse (BGE), dated June 11, 1997, Request for Additional Information Regarding the Technical Specification Change Request to Convert to the Improved Technical Specifications (TAC Nos. M97363 and M97364)

Reference (a) transmitted questions regarding Section 3.8 of Baltimore Gas and Electric Company's application to convert to the Improved Standard Technical Specifications.

The responses for Section 3.8 are provided in Attachment 1 of this letter. Also attached to this letter is Revision 9 to the original license amendment application. These changes result from the responses provided in Attachment 1, as well as other changes identified by plant personnel. Changes to the No Significant Hazards Considerations discussions are included where appropriate.

To assist in reviewing this revision, a list describing each of the changes is provided (Attachment 2). All of the material for each change is grouped by change in Attachment (3). Attachment (4) provides the revision by Improved Technical Specification Section for ease of replacing pages in the original amendment request. Page replacement instructions are provided. All changes are marked with revision bars and are labeled Revision 9.

The Plant Operations and Safety Review Committee and a subcommittee of the Offsite Safety Review Committee have reviewed revisions resulting in changes to the No Significant Hazards Considerations and concur that operation with the proposed revisions will not result in an undue risk to the health and

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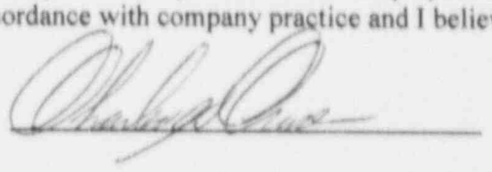
safety of the public. Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

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 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 23 day of October, 1997.

WITNESS my Hand and Notarial Seal: Denise D Smith
Notary Public

My Commission Expires: 2/2/98
Date

CHC/PSF/bjd

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

ATTACHMENT (1)

IMPROVED TECHNICAL SPECIFICATIONS, REVISION 9

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
October 23, 1997

ATTACHMENT (1)

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.5		Unit 1: SR 3.8.1.10 The proposed deletion of the CTS constraint to conduct this SR during shutdown does not appear to be acceptable. The licensee has not provided a convincing argument to demonstrate this SR can be conducted at power in a totally safe manner.	The licensee should provide an adequate justification, or retain the CTS constraint.	
BGE Response: DOC L.5 will be revised to better justify why performance of this surveillance (manual transfer from normal to alternate offsite power source) will not cause perturbations in electrical distribution system that could challenge steady state operation. The Improved Standard Technical Specifications (ISTS) Bases provided this as the reason for the Note. DOD 30 will be added to justify the deviation from NUREG-1432.					
2	L.2		Unit 1: SR 3.8.1.5 The proposed deletion of the CTS requirement to test DGs on a staggered test basis is acceptable. However, the justification is somewhat less than adequate.	The justification should be revised to include information regarding the impact on plant safety of this change and reference to any generic studies that may have been conducted on the issue of staggered testing.	
BGE Response: DOC L.4 will be revised to include the requested information.					
3	LA.2		Unit 1: CTS SR 4.8.1.1.2.d Relocation of the CTS requirement to inspect the DGs in accordance with vendor recommendations at every refueling is acceptable. However, relocation of this requirement to plant procedures is not acceptable. This is an important part of maintaining EDG reliability and should be incorporated into a document/program for which controls have been established.	The TRM or Maintenance Rule Program are acceptable for relocation. The licensee should revise the submittal accordingly.	
BGE Response: DOC LA.2 will be revised to document moving this requirement to a program to a process in the Maintenance Rule Program.					

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IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	M.1		Unit 1: Insert SR 3.8.1.1.7 The staff does not understand why the DG from the other Unit is only required to be subject to 4 SRs. Why is the affected DG not required to undergo all SR testing?	The licensee should provide a detailed discussion of what is intended by this SR.	
BGE Response: Only the four Surveillance Requirements (SRs) are required because more time is allowed for the opposite unit diesel generator (DG) to be ready to accept loads and automatic starting and unloading is not required.					
5			Unit 2: Action A.1 - Unit 2 requires performance of SR 3.8.1.1. For Unit 1, Action A requires performance of SR 3.8.1.1 or SR 3.8.1.2.	Why is there a difference between Units 1 and 2?	
BGE Response: The discrepancy between Unit Nos. 1 and 2 will be corrected.					
6	L.5		Unit 2: SR 3.8.1.10 The proposed deletion of the CTS constraint to conduct this SR during shutdown does not appear to be acceptable. The licensee has not provide a convincing argument to demonstrate this SR can be conducted at power in a totally safe manner.	The licensee should provide an adequate justification, or retain the CTS constraint.	
BGE Response: See response to RAI 3.8.1-1.					
7	L.4		Unit 2: SR 3.8.1.5 The proposed deletion of the CTS requirement to test DGs on a staggered test basis is acceptable. However, the justification is somewhat less than adequate.	The justification should be revised to include information regarding the impact on plant safety of this change and reference to any generic studies that may have been conducted on the issue of staggered testing.	

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IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: See response to RAI 3.8.1-2.					
8	LA.2		Unit 2: CTS SR 4.8.1.1.2.d.1 Relocation of the CTS requirement to inspect the DGs in accordance with vendor recommendations at every refueling is acceptable. However, relocation of this requirement to plant procedures is not acceptable.	This is an important part of maintaining DG reliability and should be incorporated into a document/program for which controls have been established. The TRM or Maintenance Rule Program are acceptable for relocation. The licensee should revise the submittal accordingly.	
BGE Response: See response to RAI 3.8.1-3.					
9	M.1		Unit 2: Insert 3.8.1.17 The staff does not understand why the DG from the other unit is only required to be subject to 4 SRs. Why is the affected DG not required to undergo all SR testing?	The licensee should provide a detailed discussion of what is intended by this SR.	
BGE Response: See response to RAI 3.8.1-4.					
10		JD.10	STS SR 3.8.1.10 requires verifying each DG, operating at a power factor≤ [0.9], does not trip, and voltage is maintained ≤ [5000] V during and following a load rejection of ≥ [4500] kw and ≤ [5000] kw, every 18 months. ITS 3.8.1 does not include this STS requirement. There is inadequate justification of deleting this STS requirement.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
BGE Response: DOD 27 will be provided in place of DOD 10 to justify this change.					
11		JD.10	STS SR 3.8.1.11 requires verifying on an actual or simulated loss	Provide justification for the STS deviation based	

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3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			of offsite power signal: 1) De-energization or emergency buses. 2) Load shedding from emergency buses. 3) DG auto-starts from the standby condition, loads, and maintains voltage and frequency for ≥ 5 minutes. ITS 3.8.1 does not include this STS requirement. There is inadequate justification for deleting this STS requirement.	on current licensing basis, system design, or operation constraints.	
BGE Response: DOD 25 will provided to justify this change.					
12		JD.10	STS SR 3.8.1.14 requires verifying each DG, operating at a power factor ≤ [0.9], operates for ≥ 24 hours. ITS 3.8.1 does not include this STS requirement. There is inadequate justification for deleting this STS requirement.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
BGE Response: Improved Standard Technical Specification SR 3.8.1.14 will be retained, and DODs 26, 28, and 29 will be provided to describe the deviations from the ISTS.					
13		JD.10	STS SR 3.8.1.15 requires verifying each DG starts and achieves, in ≤ [10] seconds, voltage ≥ [3740] V and ≤ [4580] V, and frequency ≥ [58.8] Hz and ≤ [61.2] Hz. ITS 3.8.1 does not include this STS requirement. There is inadequate justification for deleting this STS requirement.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
BGE Response: DOD 27 will be provided to justify the deviation from the ISTS.					

BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS

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IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment #1		5	Insert B. 3.8.1 Background The last paragraph of the insert includes RG 1.9 as a reference. In the list of references, this RG (1.9) is listed as Reference 3, but the list is annotated to indicate that the reference is the Draft version of RG 1.9, Rev. 3, published in April 1992. A draft of a RG is not an official NRC document and should not be used as a reference or for any other purpose. Is it the licensee's intent to reference Rev. 3 to RG 1.9 dated July 1993. Also since the licensee proposes to retain Safety Guide 9 as a reference, the licensee should provide details of what parts of RG 1.9, Rev. 3 are applicable, what parts of Safety Guide 9 are applicable, and any conflicts between the two documents. The deleted NUREG narrative includes a discussion of what an offsite circuit is. The proposed Background material does not include a similar discussion, but no justification for the omission has been provided.	The licensee should provide an appropriate justification, or include the appropriate description.	
BGE Response: The Bases will be modified to clarify what an offsite circuit is. The Bases state that the ratings for one DG are based on Regulatory Guide 1.9 Revision 3, which will be adopted, and the others SG 9. This is correct and additional explanation is not necessary to explain the difference.					
Bases Comment #2		1	Applicable Safety Analysis The justification provided (1) for deletion of "or all onsite AC power" is inappropriate.	The licensee should provide an appropriate justification for this change that reflects the design basis for the plant (i.e., it is not designed to be capable of safe shutdown if the DGs become inoperable).	
BGE Response: The words will be restored to the Bases.					

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IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment #3		3	LCO (two places) In the event of a LOCA, are safety loads block loaded to offsite power? The CCNPP description of the offsite circuits lacks the details included in the NUREG model. In the third paragraph of the LCO Bases, the term "Frequency" appears to be partially lined out. Is it the licensee's intention to delete this term? If so, why?	The licensee should provide a detailed description of the three qualified offsite circuits and how they relate to each other, or provide a detailed justification on why inclusion of such material is inappropriate at CCNPP. Justification 3 does not address the issue.	
BGE Response: A better description will be provided in the Bases, explaining that the loads are block loaded, except when the 69 kV SMECO line is used. The term Frequency was not intended to be lined out.					
Bases Comment #4			LCO The Bases markup appears to indicate that automatic start of the DGs is not required in Modes 4-6. Is this correct? If the licensee is of the opinion that this is the licensing basis for the plant, the licensee should provide specific references and documentation, as appropriate, that the staff has, and continues to accept this as the CCNPP design/licensing basis.		
BGE Response: Automatic start is not required in Modes 5 and 6, and appropriate changes and justification will be provided.					
Bases Comment #5		6	LCO The Bases section dealing with DGs in test mode reverting to running standby in the event of a LOCA is deleted. However, justification (6), which is annotated adjacent to the deleted material does not address the issue.	The licensee should provide an adequate justification, or retain the Bases material.	
BGE Response: Modified NUREG words will be retained, and DOD 32 will be provided to justify the change.					
Bases Comment		9	Insert B 3.8.1 How is the DG in LCO 3.8.1.c made available when required to provide power to the CREVS, CRETS, and H_2	This deletion is acceptable on the basis that this is not the CCNPP design. However,	

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BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
#6			Analyzer? The licensee has opted to delete the Bases material which addresses fast transfer capability in the last paragraph of the LCO Bases.	nothing has been provided to describe how the transfer from one offsite circuit to another is accomplished. The licensee should provide this information.	
BGE Response: The Bases will be modified to reflect that the 3.8.1.c DG is capable of supplying the power for the opposite unit Control Room Emergency Ventilation System (CREVS), Control Room Emergency Temperature System (CRETS), and H_2 Analyzer.					
Bases Comment #7		1	Applicability What is unique to the CCNPP design such that deletion of the term "abnormal transients" is acceptable?		
BGE Response: The words will be restored.					
Bases Comment #8		8	Action A.2 Does the CCNPP design include any single train systems that are not covered by or are exempt from this Required Action?		
BGE Response: Yes, an example is Control Room Recirculation Signal (CRRS).					
Bases Comment #9		10	Surveillance Requirements Justification 10 states that the Bases information cannot be verified against the CCNPP design. Does this mean that the licensee has no idea what, if any voltage drop was considered in the design of the CCNPP AC distribution system and cannot provide any assurance that the minimum required AC voltage to all plant equipment is available at all times? How does this justification affect the loss of voltage and degraded voltage setpoint and allowable values established in	The licensee should provide a detailed response to the staff's concern.	

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BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			Section 3.3 of the ITS?		

BGE Response:

Most of the Bases information will be retained, but the voltages will be for transient vice steady state voltages, and the associated reference is removed. Reference to allowances for voltage drops to equipment through the 120 V level is also removed because the Calvert Cliffs voltages reference transient voltage limits. A modification installing new relays during the 19998 Calvert Cliffs outage will provide steady state voltages for inclusion in the ITS Bases. DOD 10 will be modified, and this change will be included in the next revision to the Calvert Cliffs ITS.

Bases Comment #10		9	SR 3.8.1.3 and SR 3.8.1.9 The Bases change is not acceptable because the related ITS change is not acceptable.		

BGE Response:

See response to RAI NUREG 3.8.1-2.

Bases Comment #11		20	SR 3.8.1.4 The load values stated for SR 3.8.1.4 and SR 3.8.1.11 are identical. In the case of SR 3.8.11, the stated load values are adequate to verify DG capability of accepting loads equal to or rather than expected accident loads. However, these same load values, when used in SR 3.8.1.4 are not adequate to verify the exact same DG capability. The staff does not understand this proposed Bases change, and justification 20 does not help.	The licensee should provide an adequate justification for this proposed change.	

BGE Response:

The values are only the same for No. 1A DG. For the other DGs, the SR 3.8.1.11 values are greater. SR 3.8.1.4 values ensure: a) for No. 1A DG, the DG is capable of accepting a load greater than or equal to the predicted accident load, and b) for the remaining DGs, each DG is capable of accepting a load greater than or equal to 90% of the predicted accident loads for each DG. The Bases of SR 3.8.1.4 will be modified to reflect this information and DOD 20 will be clarified.

Bases Comment #12		9	SR 3.8.1.4 Deletion of NUREG Note 3 is not acceptable because the corresponding ITS change is not acceptable.		

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BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: See response to RAI NUREG 3.8.1-4.					
Bases Comment #13		11	SR 3.8.1.4 Is the purpose of this justification to state that CCNPP does not attempt to include a lagging power factor as part of the monthly DG surveillance? If so, what is the rationale for not doing so?		
BGE Response: The information will be retained.					
Bases Comment #14		1	SR 3.8.1.4 Deletion of NUREG Note 3 is not acceptable because the corresponding ITS change is not acceptable.		
BGE Response: See response to RAI NUREG 3.8.1-4.					
Bases Comment #15		9	Insert SR 3.8.1.8 The part of the change dealing with deleting Mode restrictions is not acceptable.		
BGE Response: See response to RAI NUREG 3.8.1-7.					
Bases Comment #16		9, 3	SR 3.8.1.10 The proposed changes to the Bases are not acceptable because the corresponding ITS changes are not acceptable.		
BGE Response: See response to RAI NUREG 3.8.1-9.					

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BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment #17		9	Insert SR 3.8.1.11 and SR 3.8.1.12 The proposed Bases is not acceptable because the ITS changes are not acceptable.		
BGE Response: See response to RAI NUREG 3.8.1.10.					
Bases Comment #18		1, 2, 3	SR 3.8.13 The proposed changes to the Bases are not acceptable because the ITS changes are not acceptable.		
BGE Response: See response to RAI NUREG 3.8.1-11.					
Bases Comment #19		9	NUREG SR 3.8.1.10 See comments re: deletion of this SR in comments to LCO 3.8.1.		
BGE Response: See response to RAI NUREG 3.8.1-10.					
Bases Comment #20		9	NUREG SR 3.8.1.11 See comments re: deletion of this SR in comments to LCO 3.8.1.		
BGE Response: See response to RAI NUREG 3.8.1-11.					
Bases Comment #21		9	NUREG SR 3.8.1.12 See comments re: deletion of this SR in comments to LCO 3.8.1.		

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BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: See response to RAI NUREG 3.8.1-12.					
Bases Comment #22		9	SR 3.8.1.14 See comments re: changes to SR 3.8.1.14 (ITS) in comments to LCO 3.8.1.		
BGE Response: See response to RAI NUREG 3.8.1-13.					
Bases Comment #23		9	NUREG SR 3.8.1.14 and NUREG SR 3.8.1.15 See comments re: deletion of these SRs in comments to LCO 3.8.1.		
BGE Response: See response to RAI NUREG 3.8.1-12 and -13.					
Bases Comment #24		9	SR 3.8.1.15 See comments re: changes to this SR in staff comments to LCO 3.8.1.		
BGE Response: See response to RAI NUREG 3.8.1-14.					
Bases Comment #25		9, 1, 3	NUREG SR 3.8.1.17 See comments re: deletion of this SR in staff comments to LCO 3.8.1.		
BGE Response: See response to RAI NUREG 3.8.1-15.					
Bases		4, 1,	SR 3.8.1.16 See comment re: changes to this SR in staff		

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BASES 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Comment #26		3	comments to LCO 3.8.1.		
BGE Response: See response to RAI NUREG 3.8.1-16.					
Bases Comment #27		9	Insert SR 3.8.1.17 See comments re: this SR in staff comments to LCO 3.8.1.		
BGE Response: See response to RAI 3.8.1-4.					
Bases Comment #28		9	NUREG SR 3.8.1.20 See comments re: deletion of this SR in comments to LCO 3.8.1		
BGE Response: See response to RAI NUREG 3.8.1-17.					

NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #1		1	SR 3.8.1.3 The justification does not make an adequate case for deleting the second sentence of Note 3 in this SR.	The sentence should be retained as part of the Note.	
BGE Response: A sentence regarding modified start procedures in ISTS SR 3.8.1.2 Note 3 will be restored with the exception of the reference to "time" which is not part of Current Licensing Basis (CLB).					

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NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #2			SR 3.8.1.3 The term "from standby condition" has been deleted from the SR, but no justification is provided.	The licensee should provide an appropriate justification, to retain the NUREG wording.	
BGE Response: DOD 50 will be provided. Current Licensing Basis does not require the monthly test from ambient conditions, but it is performed every six months.					
NUREG Comment #3			SR 3.8.1.4 Proposed Note 1. to this SR does not make sense. The licensee has chosen to use the symbol for "equal to or greater than " for the loading requirements of this SR. By definition, there is no "load range."	The Note serves no purpose and should be deleted.	
BGE Response: The ISTS Note allows the DG load to be either greater than the upper limit or less than the lower limit during momentary transients. Calvert Cliffs has kept the lower limit, and the Note is still applicable (i.e., during momentary transient where the load falls below the limit). However, there is no load range, so "load range" will be changed to "load limit" and maintain the Note.					
NUREG Comment #4		18	SR 3.8.1.4 NUREG Note 3 is proposed for deletion. Justification 18 states that CCNPP is not currently restrained from testing more than one DG at a time, and proposes to retain their "right to do so." The staff disagrees with the licensee's position. CTS SR 4.8.1.1.2.a prefaces all DG SRs by stating they will be conducted on a staggered test basis. Requiring staggered testing eliminates the possibility for simultaneous testing, and justification 18 is wrong.	The licensee should revise the submittal to retain NUREG Note 3 to this SR since it reflects the CCNPP current licensing basis.	
BGE Response: The Note will be retained.					
NUREG Comment #5		1	SR 3.8.1.4 The licensee has opted to retain the CCNPP CLB with regard to DG loading requirements. Specifically, the loading requirements are stated in terms of "equal to or greater	The staff requests that the licensee provide such insight to aid the staff in understanding the licensee's choice.	

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NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			than" a specified value. The staff does not understand why the licensee has not adopted the NUREG language which includes a load range, i.e., ≥ (kw) but ≤ (kw), and to which NUREG Note 2 is applicable. Justification 1 provides no insight into why this choice was made.		
BGE Response: Enhanced justification will be provided.					
NUREG Comment #6		2	SR 3.8.1.7 The bracketed term "automatically" in the NUREG is proposed to be deleted from the CCNPP ITS. Does this mean that the DGs at CCNPP does not have automatic transfer of fuel oil from the storage tank to the day tanks? If so, how is this accommodated in the accident analysis? If this is not the CCNPP design, why is the term "automatically" proposed to be deleted from the ITS?	The licensee should revise this justification to address the staff's concerns.	
BGE Response: The term "automatically" will be restored.					
NUREG Comment #7		1	Insert SR 3.8.1.8 The licensee proposes to move NUREG SR 3.8.1.18 to after ITS SR 3.8.1.7, and change the SR no. to 3.8.1.8. This is acceptable. The licensee has also proposed to change the frequency from 18 months to 31 days. No justification for this change is provided but the staff has no objection and this change is also acceptable. The licensee also proposes to delete the Note which precludes performing this SR in Modes 1-4. This latter change does not have a justification and is, therefore, not acceptable. NOTE: TSTF-8 is acceptable.	The staff will reconsider this change following submittal of an adequate justification by the licensee.	
BGE Response: DOD 31 will be provided to justify the change.					

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NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #8		6	SR 3.8.1.9 This licensee proposes to delete the voltage requirement of this SR but maintain the frequency requirement (60 Hz). The rationale in justification 6 essentially states that voltage is not part of CCNP? CTS requirements. The staff acknowledges that the CTS only addresses reaching 60 Hz in less than or equal to 10 sec, but an acceptable voltage to allow loading in the same time frame is an inherent part of DG OPERABILITY. Since the 184 day fast start and the allowance for a modified start was added by amendment to the CCNPP license, it is highly probable that the omission of voltage requirements from this SR was an oversight.	The licensee should consider adding voltage as an acceptance criteria to successfully conducting this SR.	
BGE Response: The voltage requirement wil' be retained, and DOCs M.10 and L.12 and DODs 33 and 34 will be provided to justify the changes.					
NUREG Comment #9		1, 2	SR 3.8.1.10 The SR is modified to delete the terms "automatic" and "manual" from the requirement to transfer from the normal to the alternate offsite circuit. However, the justifications annotated as being associated with this change do not address the change. The licensee also proposes to change the frequency of this SR from 18 mo. to 24 mo. This proposed change is beyond the scope of the ITS. The licensee also proposes to delete the Note which prohibits performance of this SR in Modes 1 and 2. However, neither justification 1 nor 2 provide any rationale for the proposed deletion. Therefore, this change will be considered.	The licensee should provide adequate justifications for the changes.	
BGE Response: The term "manual" will be retained, per design. The CLB is 24 months for the frequency. DOD 30 will be provided for deletion of the Note.					

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NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #10		9	SR 3.8.1.11 & SR 3.8.1.12 Should the inclusion of these SRs in the ITS, to the exclusion of other SRs be found acceptable for any reason, the 24 mo. frequency is still beyond scope.		
BGE Response: The 24 month frequency is the current licensing basis. Improved Technical Specification (ITS) SR 3.8.1.12 will be removed, justified by DOC L.11.					
NUREG Comment #11		1, 2, 6	SR 3.8.1.13 Changes to the NUREG SR (3.8.1.9) are proposed as follows: 1) delete the Note which prohibits performing this SR in Modes 1 and 2, 2) deletion of the Note directing the SR be conducted at a power factor of $\leq$ [0.9], and deletion of the SR acceptance criteria for frequency and voltage. The licensee has not provided an adequate justification for any of these changes. Therefore, they will be considered not acceptable pending receipt of adequate justifications. Also, the change from 18 mo. to 24 mo. is beyond scope.	Provide adequate justifications.	
BGE Response: DOD 32 and DOD 50 will be provided to justify the changes. The 24 month frequency is CLB.					
NUREG Comment #12		1	SR 3.8.1.12 (NUREG) The NUREG markup shows this SR as being deleted. However, the indicated justification (1) does not address this change at all. Deletion of this SR will be considered not acceptable pending receipt of an adequate justification.		
BGE Response: DOD 25 will be provided to justify the deviation.					
NUREG Comment #13		1, 2 21	SR 3.8.1.14 The changes associated with this SR are as follows: 1) the Note prohibiting performance of this SR in Modes 1 and 2 is deleted, 2) the NUREG language in the Body of the TS is		

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NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			deleted in favor of licensee proposed verbiage, and 3) the frequency is proposed to be changed from 18 mo. to 24 mo. The first change is not acceptable because the justifications provided (1, 2, and 21) do not address deleting the Note. Specifically, the justifications do not establish why performing this SR at power does not constitute a risk to plant safety. The proposed verbiage for the actual SR is not desirable because it does not adequately address the two parts of the NUREG SR; i.e., verifying that automatic trips that are desired to be bypassed are in fact bypassed, AND automatic trips that are not desired to be bypassed are in fact not bypassed. The frequency change from 18 months to 24 months is beyond the scope of this ITS conversion.	The licensee should provide an adequate justification, or retain the NUREG language. The NUREG language should be retained because it more accurately expresses the purpose of the SR.	
BGE Response: DOD 45 will be provided to justify the first change. A modified version of the NUREG words will be retained in response to comments on the second change. DOD 21 will be revised and DOC M.11 will be provided. The third change is not a change, 24 months is CLB.					
NUREG Comment #14		20	SR 3.8.1.15 The licensee has proposed to revise the language of this SR. The proposed revision deletes the three part structure of the NUREG in favor of a single, continuous, multipart requirement narrative. The revision also deletes part c of the NUREG SR in its entirety. The justification for this (11) is that the DGs at CCNPP do not return to ready to load status. The staff is concerned that the proposed revision may be misleading. The NUREG organization for this SR is intended to convey the thought that there are 3 separate but sequential parts to this SR. The proposed single narrative defeats that purpose. In addition, justification 11 is not clearly understood. Once the safety bus	The staff recommends the licensee review the proposed changes in light of staff comments with a view towards retaining the NUREG format and language, as appropriate.	

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NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			loads are transferred to offsite power by opening the DG output breaker, what status is the DG in. Is it inoperable? Is the status indeterminate? Is the DG in running standby ready to accept loads? The frequency change from 18 to 24 months is beyond scope of the ITS conversion process.		
BGE Response: DOD 11 and DOC M.5 will be modified to better explain the Calvert Cliffs specific aspects of the specification. The surveillance will be modified to adopt a modified NUREG format, and DOD 35 will be added to explain why it is acceptable to perform the surveillance at power. The CLB surveillance frequency is already 24 months.					
NUREG Comment #15		1	NUREG SR 3.8.1.17 This SR is proposed to be deleted from the CCNPP ITS. The justification provided is 1. Does the staff understand correctly that the DGs at CCNPP do not have a test override capability and will continue to operate in Test Mode in the event of a DBA/LOOP while the DG is undergoing testing? If this is the CCNPP design, the DGs are inoperable during testing. How is this handled at CCNPP?		
BGE Response: When No. 1B, 2A, and 2B DGs are tested, 1) if they are in local, it will not work, 2) if they are at rated speed being controlled by the Control Room, it will work, 3) if they are loaded and there is a safety injection actuation signal (SIAS), loads will be started and the DG will not trip off, and 4) if the DGs are loaded, and there is a loss-of-offsite power (LOOP) and a SIAS, the DG breaker will open, then close, and loads will be sequenced on. The No. 1A DG has the test override feature, but the test was not added when the DG was installed.					
NUREG Comment #16		20, 6	SR 3.8.1.16 The licensee proposes to delete frequency and voltage from the acceptance criteria of this SR. The justification (6) is that voltage and frequency are demonstrated every 31 days, and need not be repeated here. The staff does not agree with the licensee's justification. The voltage and	The staff recommends that the licensee reconsider the proposed deletion of these acceptance criteria.	

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NUREG 3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			frequency acceptance criteria in this SR are not demonstrated during the monthly test, and should be included as part of this SR. The proposed change from 18 months to 24 months is beyond the scope of the ITS conversion process.		
BGE Response: Voltage and frequency will be restored to the SR, see response to NUREG RAI 8. A 24 month interval is part of the CLB.					
NUREG Comment #17		20	NUREG SR 3.8.1.20 The licensee proposes to delete this SR from the CCNPP ITS. However, the justification (10) is not understood. The purpose of this SR is not a common mode failure or reliability issue as discussed in the justification.	The licensee should provide a revised justification for the proposed deletion, or retain the SR in the CCNPP ITS.	
BGE Response: DOD 27 will be provided to justify the deviation.					
NUREG Comment #18		3	SR 3.8.1.17 This SR is added to address the DG required by LCO 3.8.1.c, and requires performance of SRs 3.8.1.3, 3.8.1.5, 3.8.1.6, and 3.8.1.7. The staff does not understand this SR. If a DG from another unit is required to support operation of the subject unit, why should the OPERABILITY of the other unit DG not be tied to successful performance of all the applicable SRs for the DG in that unit? Why is it only required to perform the 4 SRs identified above?	The licensee should revise this SR and justification (3) as necessary to address the staff's concerns.	
BGE Response: Same answer as 3.8.1 comment 4.					

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3.8.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		Unit 1: CTS Action a.1 (Also Applies to LCO 3.8.3) Relocation of the CTS requirements regarding movement of heavy loads from TS is acceptable. However, the justification requires additional work. Specifically, endorsement of NUREG-1432 means that movement of heavy loads will be conducted in a manner that will preclude dropping of the load on irradiated fuel. The statement in justification LA.2 that heavy loads are not initiators of any event is not entirely true - the fuel handling accident assumes an irradiated fuel assembly is dropped.	Justification LA.1 should be revised accordingly.	
BGE Response: DOC LA.1 will be revised, and move the details to the Updated Final Safety Analysis Report (UFSAR).					
2	LA.2		Unit 1: CTS Footnote* (Also applies to LCO 3.8.3) The proposal to move this footnote to the Bases is not acceptable. The footnote modifies the TS required action and, as such, is not appropriate Bases material. The purpose of the Bases is to explain why something is in the TS, not to establish requirements. In this case, the Bases should explain what constitutes a safe, conservative position, but the permissive to establish a safe, conservative position prior to implementing the Required Actions must remain in TS. The CTS markup includes another LA.2 annotation. However, it is not clear what if any change this annotation is associated with.	The licensee should provide more details re: this annotation.	
BGE Response: The purpose of the footnote is to ensure that the phrase "Immediately Suspend" is not taken literally, so an operator would not stop fuel movement with a bundle hanging on the refueling machine. The footnote allows the movement to out the bundle in a storage location. This information is applicable to the Bases, since the Bases describe what "Immediately Suspend" means. The NUREG Bases already contains these words under ITS 3.8.2 Actions A.2.1 through A.4.					

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3.8.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
DOC LA.2 is related to the asterisk in CTS Action A.1.					
3	L.3		Unit 1: CTS Action a.3 Moving this CTS requirement from the AC sources TS to refueling TS (3.9) is acceptable, and is an Administrative change. However, deleting the requirement in its entirety is not acceptable.	The licensee should verify that these CTS requirements are reflected in Section 3.9 of the ITS, and change this justification accordingly.	
BGE Response: The Action is not needed. If a power source is inoperable, and does not result in a loss of shutdown cooling. Only Core Alterations, positive reactivity changes, and movement of irradiated fuel must stop. With these evolutions suspended, Containment operability is not required. If shutdown cooling is also lost due to the loss of the AC source, ITS LCOs 3.9.4 and 3.9.5 (CTS 3.9.8.1 and CTS 3.9.8.2) will require these Actions to ensure a potential radioactivity release due to the insufficient cooling does not occur. Therefore, the change is a less restrictive change because the requirement is being deleted.					
4	L.2		Unit 1: SR 3.8.2.1 The staff does not agree with the licensee's concept of which SRs from LCO 3.8.1 are applicable in Modes 5 & 6 (Shutdown). See attached chart which provides the staff position regarding SRs that are 1) applicable and must be performed, 2)applicable but are not required to be performed, and 3) are not applicable.	This item requires discussion between the staff and the licensee.	
BGE Response: DOD 46 will be provided to justify differences from NUREG-1432. DOD 21 will not be used. SR 3.8.2.1 will be modified to except SR 3.8.1.8, SR 3.8.1.10, SR 3.8.1.13, and SR 3.8.1.15. This is consistent with the Nuclear Regulatory Commission (NRC) position, except: a. SR 3.8.1.12 is not applicable because it has been deleted by a different change. b. The NRC position was that SR 3.8.1.14 (changed to SR 3.8.1.13 due to the deletion of SR 3.8.1.12) should be applicable. The DGs are affected by either a safety injection signal or a LOOP signal. Neither of these two signals are required to start the DGs in Modes 5 and 6 or during movement of irradiated fuel assemblies. Therefore, it is not necessary to include this test in SR 3.8.2.1. New DOD 46 to Section 3.8 has also been provided to justify differences from NUREG-1432 SR 3.8.2.1. In addition, the Note to SR 3.8.2.1 has also been modified to be consistent with the NRC position shown in the chart attached to the comment, with the following exceptions: a. The NRC position was that SR 3.8.1.7 should not be performed. However, performance of this test does not impact safety and the current NUREG requirements do not exempt this test from being performed. Therefore, this test will be performed; and				

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3.8.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
b. The NRC position was that SR 3.8.1.12 should be performed. This SR has been deleted as described above and will not be performed.					
5	LA.1		Unit 2: CTS Action a.1 Relocation of the CTS requirements regarding movement of heavy loads from TS is acceptable. However, the justification requires additional work. Specifically, endorsement of NUREG-1432 means that movement of heavy loads will be conducted in a manner that will preclude dropping of the load on irradiated fuel. The statement in justification LA.2 that heavy loads are not initiators of any event is not entirely true - the fuel handling accident assumes an irradiated fuel assembly is dropped.	Justification LA.1 should be revised accordingly.	
BGE Response: See response to 3.8.2 RAI 1.					
6	LA.2		Unit 2: CTS Footnote* The proposal to move this footnote to the Bases is not acceptable. The footnote modifies the TS required action and, as such, is not appropriate Bases material. The propose of the Bases is to explain why something is in the TS, not to establish requirements. In this case, the Bases should explain what constitutes a safe, conservative position, but the permissive to establish a safe, conservative position prior to implementing the Required Actions must remain in TS. The CTS markup includes another LA.2 annotation. However, it is not clear what if any change this annotation is associated with.	The licensee should provide more details re: this annotation.	
BGE Response: See response to 3.8.2 RAI 2.					
7	L.3		Unit 2: Moving this CTS requirement from the AC sources TS to refueling TS (3.9) is acceptable, and is an Administrative	The licensee should verify that these CTS requirements are reflected in Section 3.9 of the	

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3.8.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			change. However, deleting the requirement in its entirety is not acceptable.	ITS, and change this justification accordingly.	
BGE Response: See response to 3.8.2 RAI 3.					
8	L.2		Unit 2: The staff does not agree with the licensee's concept of which SRs from LCO 3.8.1 are applicable in Modes 5 & 6 (Shutdown). See attached chart which provides the staff position regarding SRs that are 1) applicable and must be performed, 2)applicable but are not required to be performed, and 3) are not applicable.	Justification LA.1 should be revised accordingly.	
BGE Response: See response to 3.8.2 RAI 4.					

BASES 3.8.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment #1		1, 3, 4, 12	LCO See comments re: changes to the LCO in staff comments to LCO 3.8.1.		
BGE Response: A better description of the offsite circuits will be provided, and see responses to RAIs for 3.8.1.					
Bases Comment #2		12	Applicability See staff comments re: changes to Applicability in comments to LCO 3.8.2.		
BGE Response:					

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BASES 3.8.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
See response to NUREG RAI 1.					
Bases Comment #3		12	Actions The proposed change to the Bases is not consistent with the proposed ITS.		
BGE Response: The term "in Containment" will be removed, and the Bases made consistent with the NUREG.					
Bases Comment #4		9, 21	SR 3.8.2.1 See staff comments re: SR 3.8.2.1 in comments to LCO 3.8.2. With respect to justification 21, why is it necessary to parallel the EDGs with offsite power whenever the EDGs are run?		
BGE Response: See response to 3.8.2 RAI 4. When DG is run, vendor requires DG to be loaded for approximately one hour.					

NUREG 3.8.2	DOC	JFD	CHANGE/a process in the Maintenance Rule Program DIFFERENCE	COMMENT	STATUS
NUREG Comment #1		17	LCO 3.8.2 The staff does not understand justification 17. The reason for stopping movement of irradiated fuel when there is inadequate AC power sources is to preclude the occurrence of a fuel handling accident. It has nothing to do with equipment in the fuel handling building having emergency power. The concern is that the safety equipment necessary to mitigate the consequences of a fuel handling accident could be without AC power, regardless of location.	The licensee should reconsider deletion of "During movement of irradiate fuel assemblies" from the LCO Applicability as well a justification 17.	

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NUREG 3.8.2	DOC	JFD	CHANGE/a process in the Maintenance Rule Program DIFFERENCE	COMMENT	STATUS
BGE Response: During movement of irradiated fuel assemblies will be added back in. In addition, a Note will be added, needed as a result of the additional applicability. DOD 48 and DOC M.1 will be provided to justify the changes regarding the Note.					
NUREG Comment #2		2	SR 3.8.2.1 The SR should be revised to reflect the Table prepared by the staff.		
BGE Response: See response to 3.8.2 RAI 4.					

3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.3		Units 1 & 2. CTS action b.2 As proposed, the ITS for i. ers could be interpreted as follows: at time zero, an inverter fails, and efforts begin immediately to power the AC vital bus from the backup bus; after 2 hours, the affected AD vital bus cannot be powered from the backup bus, and the applicable Condition of LCO 3.8.9 is entered; after an additional 2 hours, the affected AC vital bus is still not energized, and a plant shutdown is started. The above interpretation is not correct. For the same scenario, at the moment the inverter fails, the AC vital bus is deenergized. At this point in time, the 24 hour clock for the inverter is started, and entry into the applicable Condition of LCO 3.8.9 commences. If the affected AC vital bus is not energized within 2 hours (from the backup bus or the inverter) a shutdown is started.	The licensee should revise the submittal to retain the CTS requirements. The addition of the Note is acceptable because it does not alter any requirements. The Note serves as a reminder that loss of any inverter could very well mean that multiple conditions are entered.	

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3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			The above possible confusion could be eliminated by retaining the CTS requirement to power the vital bus from the backup bus connected to the equipment to restore the inverter by an AND. This will alert all interested parties that these Required Actions have concurrent time clocks. It also establishes beyond question what power sources are acceptable for powering the AC vital bus.		

BGE Response:

The ITS can not be misinterpreted as described in the first paragraph, since the Note to Action A does not allow two hours prior to cascading to ITS 3.8.9. ITS 3.8.7 Action A is entered upon failure of the inverter. The Note to Action A.1 requires the Unit to cascade to ITS 3.8.9 at the same time. Thus, ITS 3.8.7 Action A is entered, requiring the inverter to be restored within 24 hours, and ITS 3.8.9 Action B is entered, requiring the AC vital bus to be restored within 2 hours. The ITS 3.8.7 Action A.1, Bases supports this. The Bases state that the Note to the Action ensures that the AC vital bus is re-energized within two hours.

BASES 3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment #1		15	Background The proposed change is not acceptable. To be OPERABLE (and not in an Action) an inverter must be connected to its respective station battery. any other inverter alignment (i.e., constant voltage transformer or battery changer) is only allowed for a limited time and only in response to the LCO condition of an inverter inoperable. The discussion regarding battery chargers belongs in the Bases section for Action A.1.		

BGE Response:

Updated Final Safety Analysis Report Section 8.3.5.2 states that an inverter is normally powered from the respective DC bus. The DC bus is powered from its respective battery and/or battery charger. This is the meaning of the statement in the Bases. If the DC bus is only powered from its battery charger (i.e. the battery is inoperable), then the DC source would be inoperable and the Actions of ITS 3.8.4 would apply (restore the DC source in two hours or shutdown the unit). In

BASES 3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
addition, under normal conditions, the battery charger is supplying all the loads on the DC bus, since the charger is set up to be on float charge. Therefore, the inverter is technically powered by the battery charger even when aligned to the battery. Therefore, this change to the Bases is acceptable. The LCO Bases will be revised to indicate this alignment as a condition of inverter Operability.					
Bases Comment #2		16	LCO The proposed new paragraph is confusing. What is a "twin inverter"? How many of them are there? Can one inverter power two AC vital busses? The licensee should revise the submittal to more clearly describe the inverter arrangement at CCNPP.		
BGE Response: The Bases LCO and Background portions will be revised to more clearly describe the inverter arrangement.					
Bases Comment #3		1	LCO Note that the 3rd paragraph on this page (B 3.8-71) is not consistent with proposed changes to the Background section.		
BGE Response: The LCO Bases will be revised to be consistent with the Background section.					
Bases Comment #4		16	Action A.1 This proposed change and the associated justification (16) are not consistent with the proposed change and associated justification (15) to the Background section.	The licensee should identify which of the changes reflects the CCNPP licensing basis and make appropriate corrections to the submittal.	
BGE Response: The proposed change to Action A.1 is describing how to re-energize the AC vital bus if the inverter is inoperable. The AC vital bus normally receives power from the inverter. With the inverter inoperable, the AC vital bus must be re-energized from the 120 VAC bus. The change associated with the Background change is discussing how the inverter is powered. Both are correct, and do not conflict. Therefore, no changes to the submittal is required.					
Bases Comment #5		9	SR 3.8.7.1 See comments regarding deletion of the frequency requirement from this SR in comments to the NUREG markup for LCO 3.8.7.		

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BASES 3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: See response to 3.8.7 NUREG RAI 1.					

NUREG 3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #1		1	SR 3.5.7.1 The justification does not adequately address deleting the requirement to verify correct inverter frequency.	The licensee should revise the justification to specifically address why this deletion is acceptable.	
BGE Response: DOD 47 will be provided to justify why the inverter frequency is not verified.					

3.8.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
No comments on 3.8.8.					

BASES 3.8.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment #1		9	Applicability The proposed Bases change is not acceptable because the associated ITS change is not acceptable.		
BGE Response:					

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BASES 3.8.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
See response to NUREG 3.8.8 RAI 1.					
Bases Comment #2		12	Actions the proposed change may or many not be acceptable. However, addressing the issue only in the Bases (and not in the LCO) does not make the change acceptable. The Bases are for the purpose of explaining the TS, not for establishing requirements or limitations. If the limitation on fuel handling is indeed limited to the containment, this must be stated in the appropriate LCO Action(s). The Bases should explain why this limitation is acceptable (e.g., language from SE for Amendment 155 and 135).		
BGE Response: The term "in containment" will be retained and DOD 12 provided for justification.					
Bases Comment #3		9	SR 3.8.8.1 See comment regarding deletion of the frequency requirement from this SR in comments to the NUREG markup for LCO 3.8.8.		
BGE Response: See response to NUREG 3.8.7 RAI 1.					

NUREG 3.8.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #1		17	LCO Applicability The licensee's proposal to delete "During movement of irradiated fuel assemblies" from the LCO Applicability does not appear to be acceptable. This issue is discussed at length in the staff comment regarding the Applicability of LCO 3.8.2.		

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NUREG 3.8.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: See response to NUREG 3.8.2 RAI 1. During movement of irradiated fuel assemblies, will be added back in. In addition, a Note will be added, needed as a result of the additional applicability. DOD 48 and DOC M.1 will be provided to justify the changes regarding the Note.					
NUREG Comment #2		1, 2	SR 3.8.8.1 The justifications do not adequately address deleting the requirement to verify correct inverter frequency.	The licensee should revise the justifications to specifically address why this deletion is acceptable.	
BGE Response: See response to NUREG 3.8.7 RAI 1.					

3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.3		This addition to the TS is acceptable. However, it should be noted that the concerns regarding LCO 3.0.3 when 2 or more electrical power distribution subsystems are inoperable are not resolved by this change.	The staff has rejected TSTF-16 which was intended to compliment proposed Action E. Consequently, two or more inoperable electrical power distribution subsystems that do not result in a loss of function will still invoke LCO 3.0.3.	
BGE Response: The ITS 3.8.9 markup will be revised to remove references to TSTF-16. The conditions and required actions will also be revised to be consistent with the existing conditions and required actions in CTS 3.8.2.1 and 3.8.2.3. However, proposed Action E, which is not in the CTS, will be retained, and DOC M.2 and DOD 37 will be added, and DOC A.3 will not be used.					
2			The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response:					

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3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
TSTF does not apply to this section, and has been removed from the submittal.					
3			The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response: See response to 3.8 [illegible] AI 2.					
4			The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response: See response to 3.8.9 RAI 2.					
5			The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response: See response to 3.8.9 RAI 2.					

BASES 3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment #1		17	Background The proposed deletion of Bases material regarding transfer from the preferred offsite source to the alternate source is understandable. However, the licensee has not proposed a substitute for the deleted ma[illegible]al which addresses the CCNPP design.	The submittal should be revised to include an appropriate discussion.	

DOC = Discussion of Change
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ATTACHMENT (1)

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

BASES 3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: When the preferred offsite power source is lost to a 4.16 kV engineered safety feature (ESF) bus, the associated DG starts and supplies power to the bus. The Bases will be revised to provide this information.					
Bases Comment #2		17	Background The proposal to delete Table 3.8.9-1 is not acceptable. The licensee should provide the Table, or retain the CTS listing of AC, DC, and AC vital bus subsystems in the body of LCO 3.8.9.		
BGE Response: The Table was added back to the Bases as part of Revision 1 to the ITS submittal.					
Bases Comment #3		18	Background Justification 18 is presented as a reason for deleting Table B 3.8.9-1. The discussion includes a statement regarding shared systems and shared DC sources. LCO 3.8.1 in the ITS is the only place that "shared systems" are identified, and is limited to DG support from the other unit for Control Room Ventilation and H_2 monitoring. Nothing is said about opposite unit support for AC vital bus and DC electrical power subsystems. If the shared systems and shared DC sources are so complex as to make creating Table B 3.8.9-1 complicated to the point of being impractical, why is none of this system and DC source interdependency not included in the ITS?	The licensee should provide a detailed discussion of the CCNPP shared systems and DC sources along with the proper justification for why this is not included in the ITS.	
BGE Response: The Table was added back to the Bases as part of Revision 1 to the ITS submittal.					
Bases Comment #4		17	LCO The substitution of FSAR Fig. 8-9 for Table B 3.8.9-1 is not acceptable as discussed above. Also, the proposed language in the LCO is not consistent. In the Background section, the licensee uses systems, subsystems, and channels. In the LCO section of the Bases, the terminology "load groups" is	The licensee should explain why this lack of consistency in language is acceptable, or revise the submittal to have consistent language.	

DOC = Discussion of Change
JFD = Justification for Deviation
DOD = Discussion of Deviation

BASES 3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			used.		
BGE Response: The Table was added back to the Bases as part of Revision 1 to the ITS submittal. The reference to the UFSAR figure will be removed and consistent terminology added to the Bases.					
Bases Comment #5		1, 3	LCO This portion of the LCO Bases reverts to subsystems and channels as opposed to load groups. This is the same consistency question as addressed above.		
BGE Response: See response to 3.8.9 Bases RAI 4.					
Bases Comment #6			Action A.1 The changes associated with TSTF-16 are not acceptable because TSTF-16 has been rejected.		
BGE Response: See response to 3.8.9 RAI 1.					
Bases Comment #7			Action B.1 The changes associated with TSTF-16 are not acceptable because TSTF-16 has been rejected. The Bases markup for this Action is confusing and appears to be inconsistent with LCO 3.8.7. LCO 3.8.7 allows an AC vital bus to be powered from a constant voltage AC source for up to 24 hours, whereas this Bases section requires the bus to be powered from an inverter within 2 hours. Which LCO is correct?		
BGE Response: See response to 3.8.9 RAI 1. Also, the Bases of 3.8.9 Action B.1 will be revised to state that the vital bus must be re-energized from the inverter or the 120 VAC					

BASES 3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
bus powered by an ESF Motor Control Center (MCC) through a regulating transformer. This is consistent with LCO 3.8.7 Bases.					
Bases Comment #8			Action C.1 The changes associated with TSTF-16 are not acceptable because TSTF-16 has been rejected.		
BGE Response: See response to 3.8.9 RAI 1.					
Bases Comment #9			The changes associated with TSTF-16 are not acceptable because TSTF-16 has been rejected.		
BGE Response: See response to 3.8.9 RAI 1.					
Bases Comment #10		18	Table 3.8.9-1 See previous comments regarding deletion of Table B 3.8.9-1 and justification 18.		
BGE Response: See response to 3.8.9 RAI 1.					

NUREG 3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #			Insert Action E A.3 This addition to the TS is acceptable. However, it should be noted that the concerns regarding LCO 3.0.3 when 2 or more electrical power distribution subsystems are inoperable are not resolved by this change. The staff has rejected TSTF-16 which was intended to compliment proposed		

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RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
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NUREG 3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			Action E. Consequently, 2 or more inoperable electrical power distribution subsystems that do not result in a loss of function will still invoke LCO 3.0.3.		
BGE Response: See response to 3.8.9 RAI 1.					
NUREG Comment #2			Pg 3/4 8-13 The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response: TSTF-115 does not apply to this section and TSTF-115 has been removed from the submittal.					
NUREG Comment #3			Pg 3/4 8-14 The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response: See response to 3.8.9 NUREG RAI 2.					
NUREG Comment #4			Pg 3/4 8-15 The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response: See response to 3.8.9 NUREG RAI 2.					
NUREG Comment #5			Pg 3/4 8-16 The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		

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NUREG 3.8.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: See response to 3.8.9 NUREG RAI 2.					
NUREG Comment #6			Condition A, Condition B, and Condition C The changes associated with TSTF-16 are not acceptable because TSTF-16 has been rejected.		
BGE Response: See response to 3.8.9 RAI 1.					
NUREG Comment #7		2	Condition B The staff does not understand the proposed change. What is the difference between an "AC vital bus" and an "AC vital bus subsystem"? Justification (2) does not provide any details that are directly applicable to this change and does not address the staff's question.		
BGE Response: Condition B was revised to be consistent with terminology in Required Action B.1. There is no intent to change any technical requirements.					

3.8.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		Units 1 & 2: LCO 3.8.10 DOC LA.1 is not acceptable. The CTS requirements for offsite power and DG backup are not reflected in the Bases as stated in this DOC.	The DOC is not correct, is not acceptable, and the changes associated with DOC LA.1 are not acceptable. A substantial revision of the submittal in this area is required.	
BGE Response: DOC LA.1 will not be used, and DOC A.5 will provide justification for deleting the requirement that the bus be energized from an offsite power source, but aligned to an Operable DG. The restriction is not needed since CTS 3.8.1.2 (ITS 3.8.2) references that the offsite power source provide power to the AC buses. If it is not					

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

			CHANGE/DIFFERENCE	COMMENT	STATUS
			ite source is inoperable and the CTS 3.8.1.2 actions are basically the same as the actions of CTS 3.8.2.2. Also, the requirement that erable DG is also covered by ITS 3.8.2, which requires a DC bus to be capable of supplying one train of the AC electrical power listed in CTS 3.8.2.2 comprise one train). Therefore, the duplicative requirements in CTS 3.8.2.2 are not necessary and have been		
			Units 1 & 2: LCO 3.8.10 DOC LA.2 is not acceptable. The CTS requirements regarding 4160 VAC and 480 VAC busses, and 120 VAC vital busses are not included in the Bases as indicated by this LCO.	The DOC is not correct, is therefore not acceptable, and the changes associated with DOC LA.2 are not acceptable. A revision to the submittal is required.	
BGE Response: The Table was added back to the Bases of ITS 3.8.9 as part of Revision 1 to the ITS submittal. The revision also added a reference to the Table in Bases 3.8.9 Background. The approved Technical Specification 3.8.10 Bases Background references the ITS Bases 3.8.9 Background as the location to find a description of the electrical power distribution subsystems. Therefore, no further revision is necessary.					
3	LA.3		Units 1 & 2: CTS Action a.1 Footnote* to this CTS requirement should be retained in the TS. The Bases is not the appropriate place for this material. The Bases are intended to explain what is in TS, not to establish or modify requirements.	The Footnote is a modification (a permissive) to the CTS completion time of "Immediately" and should be retained in the TS.	
BGE Response: See response to ITS 3.8.2 RAI 2.					
4	LA.4		Units 1 & 2: CTS Action a.1 Relocation of the CTS requirements regarding movement of heavy loads from TS is acceptable. However, the justification requires additional work. Specifically, endorsement of NUREG-1432 means that movement of heavy loads will be conducted in a manner that will preclude dropping of the load on irradiated fuel. The statement in justification LA.4 that heavy loads are not initiators of an event is not entirely true - the fuel handling accident assumes an irradiated fuel assembly is dropped.	DOC LA.4 should be revised accordingly (see Section 5 of NUREG-1432).	

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RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
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3.8.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: DOC LA.4 will be modified to move the details to the UFSAR.					
5	L.2		Units 1 & 2: CTS Action a.3 The proposed change is acceptable. However, the justification appears to be needlessly complicated.	These CTS requirements are included in ITS Section 3.9 and need not be repeated in Section 3.8. This could also be an Administrative change.	
BGE Response: See response to ITS 3.8.2 RAI 3.					
6	LA.1		Units 1 & 2: SR 3.8.10.1 Units 1 & 2: LCO 3.8.10 DOC LA.1 is not acceptable. The CTS requirements for offsite power and DG backup are not reflected in the Bases as stated in this DOC.	The DOC is not correct, is not acceptable, and the changes associated with DOC LA.1 are not acceptable. A substantial revision of the submittal in this area is required.	
BGE Response: See response to 3.8.10 RAI 1.					
7			Units 1 & 2: The changes associated with the DC electrical power distribution subsystems have not been reviewed pending resolution of TSTF-115.		
BGE Response: TSTF-115 does not apply to this section and has been removed from the submittal.					

BASES 3.8.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases Comment		9	Applicability The proposal to delete "during movement of irradiated fuel assemblies" from the LCO		

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ATTACHMENT (1)

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

BASES 3.8.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
#1			Applicability does not appear to be acceptable. This issue is discussed at length in the staff comment regarding the Applicability of LCO 3.8.2.		
BGE Response: See response to NUREG 3.8.10 RAI 1.					
Bases Comment #2		12	Actions See comment re: justification 12 and its associated change in staff comment on Actions for LCO 3.8.8 Bases.		
BGE Response: See response to NUREG Bases 3.8.8 RAI 2. The change to the Action Bases regarding fuel movement has been removed and DOD 12 will not be used.					

NUREG 3.8.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NUREG Comment #1		17	LCO 3.8.10 Applicability The licensee's proposal to delete "During movement of irradiated fuel assemblies" from the LCO Applicability does not appear to be acceptable. This issue is discussed at length in the staff comment regarding the Applicability of LCO 3.8.2.		
BGE Response: The phrase will be added back to the Applicability consistent with the response to 3.8.2 NUREG RAI 1.					
NUREG Comment #2			Required Action A.25 The proposed change is not acceptable because CEOG-86 has not been accepted.		

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ATTACHMENT (1)

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.8

NUREG 3.8.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response: Proposed change associated with CEOG 86 was removed as part of Revision 1 to the submittal.					

DOC = Discussion of Change
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ATTACHMENT (2)

IMPROVED TECHNICAL SPECIFICATIONS, REVISION 9

SUMMARY OF CHANGES

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
October 23, 1997

ATTACHMENT (2)

SUMMARY OF CHANGES

1. Discussion of Change L.4 to Section 3.8.1 has been revised to include a more detailed justification of why the deletion of diesel generator (DG) staggered testing is acceptable. This change was requested to be provided by the Nuclear Regulatory Commission (NRC) in their comments to Section 3.8.1 (comments 2 and 7).

2. Discussion of Change LA.2 to Section 3.8.1 has been revised to relocate the requirement to a process in the Maintenance Rule Program and include a more detailed justification of why the relocation is acceptable. This change was requested to be provided by the NRC in their comments to Section 3.8.1 (comments 3 and 8).

3. The Unit 2 markup for Current Technical Specification (CTS) 3.8.1.1 Action A (page 1 of 12) has been revised to match the corresponding Unit 1 CTS markup and Improved Technical Specification (ITS) 3.8.1 ACTION A. This change was requested to be provided by the NRC in their comments to Section 3.8.1 (comment 5).

4. Discussion of Deviation 10 to Section 3.8 has been revised and new Discussion of Deviations 25 and 27 have been added to include a more detailed justification of why the deletion of the Surveillance Requirements (SRs) is acceptable. This change was requested to be provided by the NRC in their comments to Section 3.8.1 (comments 10, 11, 12, and 13, NUREG comments 12 and 17, and Bases comments 20, 21, 23, and 28). In addition, the power factor requirement and the Note that allows momentary transients outside the load and power factor limits are added to ITS SR 3.8.1.11 from NUREG-1432 SR 3.8.1.14 to ensure the power factor requirement is periodically verified. As such, Discussion of Change M.6 and L.8 [and associated No Significant Hazards Considerations (NSHC)] have been added and Discussion of Deviation 9 has been deleted and new Discussion of Deviations 26, 28, and 29 have been added. The Bases for ITS SR 3.8.1.11 is also modified to reflect this change. Also, the Bases of ITS SR 3.8.1.11 is modified to include a discussion associated with plant commitments to monitor and trend No. 1A DG performance degradation since No. 1A DG is not tested at the continuous load rating. The detailed discussion on DG monitoring was added consistent with the Baltimore Gas and Electric Company commitment made to the NRC as stated in the NRC Safety Evaluation that accepted CTS Amendments 214 (Unit 1) and 191 (Unit 2).

5. The requirement to meet the voltage and frequency requirements of ITS SR 3.8.1.9 when the modified start procedures are not used was added to Note 3 of ITS SR 3.8.1.3 and associated Bases were modified to reflect the change. In addition, the Note to allow gradual loading of the DG and the Note that only one DG could be tested at a time was included in ITS SR 3.8.1.4 and the associated Bases were modified to reflect the change. However, a plant specific reason for precluding the test from being performed on more than one DG at a time was provided. These changes were made since there is no plant specific justification for not including these requirements. In addition, Note 2 to ITS SR 3.8.1.4 was also revised to be consistent with the requirements of the SR. As a result of these changes, ITS 3.8.1 Discussion of Changes A.7, M.3, and L.6 (and associated NSHC) were modified, ITS 3.8.1 Discussion of Changes M.7 and L.10 (and associated NSHC) were added, ITS 3.8.1 Discussion of Deviations 5 and 18 were deleted, ITS 3.8.1 Discussion of Deviation 36 was added, and ITS 3.8.1 Bases Discussion of Deviation 25 was added. These changes were requested to be provided by the NRC in their comments to Section 3.8.1 (NUREG comments 1, 2, 3, and 4 and Bases comments 10, 12, 13, and 14).

6. Revised ITS SR 3.8.1.7 to include the word "automatically" when referring to testing of the DG fuel oil transfer system. The ITS SR 3.8.1.7 Bases are clarified to state that one fuel oil transfer pump is tested because No. 1A DG has two transfer pumps, No. 1B, 2A and 2B DGs have one transfer pump each, but only one is required. Also, new Discussion of Change M.8 for ITS 3.8.1 was provided to justify this addition to CTS 4.8.1.1.2.a.3. This change was requested by the NRC in their comments to Section 3.8.1 (NUREG comment 6).

7. In response to NRC comments on Section 3.8.1 (NUREG comment 10 and Bases comments 17 and 19), ITS SR 3.8.1.12, which requires verification that the auto-connected loads of the DGs do not exceed specific load values is removed from the Technical Specifications. As a result of the removal of ITS SR 3.8.1.12, all subsequent ITS SRs, and associated references to these SRs in the ITS, Bases, Discussion of Changes, NSHCs, and Discussion of Deviations are renumbered. In addition, new Discussion of Change L.11 (and associated NSHC) for ITS 3.8.1 is provide to support removal of ITS SR 3.8.1.12 (CTS 4.8.11.2.d.5).

8. In response to NRC comments on Section 3.8.1 (comments 1 and 6, NUREG comment 9, and Bases comment 16), the justification for removing the requirement to perform the manual transfer from the normal offsite power source to the alternate offsite power source during shutdown was revised (Discussion of Change L.5 and associated NSHC) and Discussion of Deviation 30 was added to justify the deviation from NUREG-1432. The change incorporates more details on how the test is performed and the relative risk associated with performing the test at power versus shutdown. In addition, the word "manual" was included in ITS SR 3.8.1.10 consistent with the wording in CTS 4.8.1.1.1.b.

9. In response to NRC comments on Section 3.8.1 (NUREG comment 7 and Bases comments 15), Discussion of Deviation 31 was added to provide more detail to justify the deletion of the Note from ITS SR 3.8.1.8 that precludes testing during operation in MODE 1, 2, 3, or 4.

10. Discussion of Deviation 32 was added in response to NRC comments on Section 3.8.1 (NUREG comment 11 and Bases comment 18) to provide more detail by which to justify the deletion of the Note from ITS SR 3.8.1.12 that precludes testing during operation in Mode 1 or 2 and Discussion of Deviation 6 was revised to provide more detail by which to justify the deletion of the voltage and frequency acceptance criteria from ITS SR 3.8.1.12.

11. In response to NRC comments on Section 3.8.1 (NUREG comments 8 and 16 and Bases comment 26), voltage and frequency requirements are added to the ITS SR 3.8.1.9 which verifies the DG start within 10 seconds and to ITS SR 3.8.1.15 (engineered safety feature/loss-of-offsite power DG test). As a result of this change the Bases for ITS SR 3.8.1.9 is modified to include requirements to monitor DG voltage and frequency during this test to ensure DG voltage regulator and governor degradations have not occurred. This additional information in the Bases is required by the NRC to allow deviation from NUREG-1432 SR 3.8.1.7.

    Discussion of Deviation 33 was added to justify the deviation from NUREG-1432 SR 3.8.1.7. In addition, two new Discussion of Changes (M.10 and L.12) were provided to justify the addition of the DG voltage and frequency requirements in both ITS SR 3.8.1.9 and ITS SR 3.8.1.15. No Significant Hazards Considerations L.12 was added to support the addition of 3.8.1 Discussion of Change L.12. Discussion of Deviation 34 was added to provide more detail by which to

justify the deletion of the Note from ITS SR 3.8.1.15 (engineered safety feature/loss-of-offsite power test) that precludes testing during operation in MODE 1, 2, 3, or 4. This Discussion of Deviation, as well as Discussion of Deviation 35 (described in item 12 below), supersede Discussion of Deviation 20. Therefore, Discussion of Deviation 20 has been deleted.

12. In response to NRC comments on Section 3.8.1 (NUREG Bases comment 11), a description of the load values to which the DGs are tested has been added to the Bases of ITS SR 3.8.1.4. In addition, ITS 3.8.1 Bases Discussion of Deviation 20 has been modified to clearly discuss why the Bases description of the load values has been changed.

13. The Bases was revised to update the reference to Regulatory Guide 1.9 draft Revision 3 to the actual Revision 3 version. In addition, the requested information concerning the offsite circuit description was added to the Background section of the Bases. These changes were requested to be provided by the NRC in their comments to Section 3.8.1 (NUREG Bases comment 1). During the development of these requested changes, typographical errors and consistency issues in the Bases were discovered and corrected. Also, in conjunction with our response to NUREG Bases comment 6 (as described in Item 14 below), the Background section of the Bases was also revised to clearly state that automatic transfer capability between offsite circuits does not exist; only manual transfer capability exists.

14. In response to NRC comments on Section 3.8.1 (NUREG Bases comment 3), the Bases was revised to provide the requested information regarding the design and loading of the offsite circuits. In addition, the NUREG Bases 3.8.1 markup inadvertently lined out the first part of the word "frequency" in the fourth paragraph of the Limiting Condition for Operation (LCO) section. This has been corrected. The NRC also requested that information be provided describing how the transfer from one offsite to another offsite occurs (NUREG Bases comment 6). The LCO section of the Bases has been revised to clearly state that only manual transfer capability between offsite circuits exists. In addition, during the resolution of these questions, typographical error and consistency issues in the LCO section of the Bases was discovered and corrected.

15. In response me to NRC comments on Section 3.8.1 (NUREG Bases comment 5), the Bases was revised to provide the requested information, related to the additional DG capabilities required to be demonstrated. However, an example different than that provided in the NUREG-1432 Bases was used, since Calvert Cliffs did not retain the Surveillance used as the example.

16. In response to NRC comments on Section 3.8.1 (NUREG Bases comment 7), the Bases was revised to add back in the phrase "or abnormal transients," consistent with the NUREG Bases.

17. In response to NRC comments on Section 3.8.1 (NUREG Bases comment 4), the LCO Section of the Bases that described the DG undervoltage start capability was revised to delete the phrase "(only in MODES 1, 2, and 3)."

18. In response to NRC comments on Section 3.8.2 (comments 1 and 5), Discussion of Change LA.1 has been revised to provide additional justification regarding the relocation of the movement of heavy loads requirements.

19. In response to NRC comments on Section 3.8.2 (NUREG comment 1, Bases comment 2), the LCO Applicability and associated Bases have been revised, consistent with NUREG-1432, to include "during movement of irradiated fuel assemblies." As a result of this change, a new Discussion of Change A.4 was added to Section 3.8.2 and appropriate CTS markup changes were made. In addition, the Note and associated Bases proposed by TSTF-36 was added since it is now necessary with the addition of the new Applicability. Discussion of Deviation 48 was added to justify the addition of this Note. Also, new Discussion of Change M.1 was added to Section 3.8.2 and appropriate CTS markup changes were made due to the addition of the Note.

20. In response to NRC comments on Section 3.8.2 (Bases comment 3), the change to the LCO and ACTIONS Bases regarding fuel movement (the addition of the phrase "in containment") has been removed.

21. In response to NRC comments on Section 3.8.7 (NUREG comment 1 and Bases comment 5) and Section 3.8.8 (NUREG comment 2 and Bases comment 3), a new Discussion of Deviation 47 for Section 3.8 has been provided to justify the deletion of the bracketed word "frequency" in SR 3.8.7.1 and SR 3.8.8.1.

22. In response to NRC comments on Section 3.8.7 (Bases comments 1, 2, and 3), the Bases Background and LCO sections have been revised to be consistent with one another with respect to power supplies to the inverters, to better describe the design of the inverters, and to clarify the alignment of the inverters to the AC bus with respect to Operability. In addition, Discussion of Deviations 15 and 16 for Bases Section 3.8 were revised to better describe the changes and to reference the applicable Updated Final Safety Analysis Report (UFSAR) sections. In addition, a typographical error in the typed ITS Bases (LCO section) has also been corrected.

23. In response to NRC comments on Section 3.8.8 (NUREG comment 1 and Bases comment 1), the LCO Applicability and associated Bases have been revised, consistent with NUREG-1432, to include "during movement of irradiated fuel assemblies." As a result of this change, Discussion of Change M.1 for ITS 3.8.8 was revised and appropriate CTS Markup changes were made. In addition, the Note and associated Bases proposed by TSTF-36 was added since it is now necessary with the addition of the new Applicability. Discussion of Deviation 48, added as part of Item 26 above, was used to justify the addition of this Note.

24. In response to NRC comments on Section 3.8.9 (comment 1, NUREG comments 1, 6, and 7, and Bases Comment 6, 7, 8, 9), references to TSTF-16 have been removed. The ACTIONS have been revised to be consistent with current licensing basis, which allows one or more AC buses to be inoperable for 8 hours, one or more vital buses to be inoperable for 2 hours, and one DC bus to be inoperable for 2 hours. Condition B has also been revised to be consistent with the associated Required Action. In addition, while ACTION E is not currently required by the Calvert Cliffs Technical Specifications, and TSTF-16 was attempting to correct problems with the addition of ACTION E to the NUREG (which was added as part of Revision 1), ACTION E will be retained in the Calvert Cliffs ITS. This will ensure proper actions are taken if a loss of safety function occurs. Discussion of Deviation 37 for Section 3.8 has been added to describe these changes. Discussion of Change A.3 for ITS 3.8.9, which justified the addition of ACTION E to the CTS, has been deleted and replaced with Discussion of Change M.3.

Appropriate Bases changes have also been made, including ensuring the Bases description in ACTION B.1 of how to power AC vital buses is consistent with LCO 3.8.7 Bases.

25. In response to NRC comments on Section 3.8.9 (NUREG Bases Comment 1), the Bases Background section has been revised to discuss the loss of preferred power and subsequent transfers.

26. In response to NRC comments on Section 3.8.9 (NUREG Bases Comment 4 and 5), the Bases LCO section has been revised to delete references to the UFSAR figure added in Revision 1 to the submittal. The Bases have also been revised to use consistent terminology across Bases sections regarding electrical power distribution subsystems.

27. In response to NRC comments on Section 3.8.10 (comments 1 and 6), Discussion of Change LA.1 for ITS 3.8.10 has been deleted and replaced with new Discussion of Change A.5 to justify the changes to the AC source alignment requirements.

28. In response to NRC comments on Section 3.8.10 (comment 4), Discussion of Change LA.4 for ITS 3.8.10 has been revised to provide additional justification regarding movement of heavy loads.

29. In response to NRC comments on Section 3.8.10 (NUREG comment 1 and Bases comment 1), the LCO Applicability and associated Bases have been revised, consistent with NUREG-1432, to include "during movement of irradiated fuel assemblies." As a result of this change, new Discussion of Change A.6 for ITS 3.8.10 was added and Discussion of Deviation 17 for Section 3.8 was deleted. Appropriate CTS Markup changes were also made. In addition, the Note and associated Bases proposed by TSTF-36 was added since it is now necessary with the addition of the new Applicability. Discussion of Deviation 48, added as part of Item 26 above, was used to justify the addition of this Note. Also, new Discussion of Change M.1 was added to Section 3.8.10 and appropriate CTS Markup changes were made.

30. In response to NRC comments on Section 3.8.10 (Bases comment 2), the change to the actions Bases regarding fuel movement has been removed and Discussion of Deviation 12 for Bases Section 3.8 was deleted.

31. While reviewing LA DOCs to ensure they were properly incorporated in the Bases, it was discovered that while Discussion of Changes LA.1, LA.3, and LA.5 for ITS 3.8.1 described that certain information was relocated to the Bases, it was not properly incorporated into the Bases. Therefore, the Bases have been revised to include the relocated information.

32. Discussion of Change LA.4 for ITS 3.8.1 states that CTS 4.8.1.1.2.a.6 will be relocated to the Bases. Upon further review, this requirement will not be relocated to the Bases but will be deleted from the ITS. New Discussion of Change L.9 for ITS 3.8.1 has been provided to justify the deletion and Discussion of Change LA.4 has been deleted.

33. While reviewing the Discussion of Changes to ensure they were properly incorporated in the Bases, it was discovered that while Discussion of Change LA.1 for ITS 3.8.9 described that certain information was relocated to the Bases, a portion of the relocated information was not

properly incorporated into the Bases. In lieu of incorporating this information into the Bases, a new less restrictive Discussion of Change (DOC L.1 for ITS 3.8.9) and associated NSHC has been provided to justify deleting the requirement that the AC buses be energized from sources of power other than the DGs (i.e., the offsite circuits). This requirement has been deleted since it is not required by NUREG-1432 (Standard Technical Specification 3.8.9 allows the AC buses to be energized from the offsite sources or the DGs). In addition, the Unit 2 CTS markup related to this change did not identify that Discussion of Change LA.1 was the reason for the change. This has also been corrected.

34. The justification for adding the Note to the Actions of ITS 3.8.5 was changed from TSTF-36 to Discussion of Deviation 48. Discussion of Deviation 48 was added as part of Item 26 above. Also, the justification for adding the Bases for the Note of ITS 3.8.5 was changed from TSTF-36 to Bases Discussion of Deviation 9.

35. When resolving NRC comments concerning the AC sources LCO, it was noted that ITS 3.8.1 did not include requirements for the other unit's offsite circuit, nor did the Actions for the other unit's DG (the requirements for the other unit's DG was included in the original submittal) include all the necessary requirements. Therefore, changes have been made to ITS 3.8.1 and associated CTS and NUREG Markups to resolve these discrepancies. To support these changes, new Discussion of Changes A.9 and L.13 and associated NSHC for ITS 3.8.1 have been added. Discussion of Change M.1 for ITS 3.8.1 and Discussion of Deviation 3 for Section 3.8 has also been revised. In addition, ITS 3.8.2 and associated CTS and NUREG Markups have also been revised to include the necessary AC sources requirements. To support these changes, new Discussion of Change A.5 and M.2 for ITS 3.8.2 have been added. Discussion of Deviation 3 for Section 3.8 has also been revised to discuss these additions.