

## NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

June 26, 1989

Docket Nos. 50-317 and 50-318

> Mr. G. C. Creel Vice President - Nuclear Energy Baltimore Gas and Electric Company Calvert Cliffs Nuclear Power Plant MD Rtes. 2 & 4 P.O. Box 1535 Lusby, Maryland 20657

Dear Mr. Creel:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - TECHNICAL SPECIFICATIONS AMENDMENTS PROPOSED UNDER GENERIC LETTER 87-09 (UNIT 1 TAC 71225; UNIT 2 TAC 71226)

On June 4, 1987, the Commission issued Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." The purpose of GL 87-09 was to provide guidance to resolve generic problems arising from STS Sections 3.0.4, 4.0.3 and 4.0.4.

Subsequently, your application of November 1, 1988 requested to amend the Calvert Cliffs Units 1 and 2 Technical Specification (TS) (Sections 3.0.4, 4.0.3 and 4.0.4) in accordance with GL 87-09.

The basis for NRC acceptance of Specification 3.0.4-related amendments under GL 87-09 is predicated on two assumptions: 1) that the remedial measures prescribed by the TS ACTION STATEMENTS for which the exception will be granted provide a sufficient level of protection to permit operational mode changes and safe long-term operation consistent with the licensing basis described in the Updated Final Safety Analysis Report for Calvert Cliffs; and 2) that it will be the exception when plant startup commences with important safety features inoperable, irrespective of the exceptions granted in response to applications under GL 87-09.

In order, for the NRC staff to conclude that the safety basis relative to the above stated assumptions is satisfied, we request that for each proposed TS exception to be granted under Generic Letter 87-09, you affirm that remedial measures, for the affected ACTION STATEMENTS, are consistent with the Updated Final Safety Analysis Report and its supporting safety analyses. In addition, we request that you identify and affirm those administrative controls (e.g., maintenance program provisions, plant operating procedures, management

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directives, onsite safety reviews, etc.) that have been established to limit the use of the Specification 3.0.4 exceptions to be granted. Your affirmation should address the training necessary for ensuring that plant operators are made aware of, and are instructed to exercise the controls promulgated in limiting the use of such exceptions.

If you determine that such administrative controls are not currently in place and additional time will be necessary in order for you to fully establish and affirm such controls, the staff would be willing to proceed with our review of that portion of your amendment application dealing with changes to TS 4.0.3 and 4.0.4. Since your proposed modifications to TS 4.0.3 and 4.0.4 are independent of TS 3.0.4 and do not require the establishment of the same level of administrative controls, these portions of your application could be issued separately.

In order for us to plan our review, it is requested that you advise us within 28 days 1) of your intentions regarding the establishment and affirmation of administrative controls governing the use of proposed TS 3.0.4 and 2) whether you would prefer the NRC staff to review the TS 3.0.4 amendment request separately from the TS 4.0.3 and 4.0.4 amendment requests or rather, perform only one combined amendment request review.

This request for information affects fewer than 10 respondents; therefore, OMB clearance is not required under Public Law 95-511.

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Scott Alexander McNeil, Project Manager

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Project Directorate I-1

Division of Reactor Projects I/II

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[ADDITIONAL INFO 71225 & 71226]

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cc:

Mr. William T. Bowen, President Calvert County Board of Commissioners Prince Frederick, Maryland 20768

D. A. Brune, Esq. General Counsel Baltimore Gas and Electric Company P. O. Box 1475 Baltimore, Maryland 21203

Mr. Jay E. Silberg, Esq. Shaw, Pittman, Potts and Trowbridge 1800 M Street, NW Washington, DC 20036

Mr. W. J. Lippold, General Supervisor Technical Services Engineering Calvert Cliffs Nuclear Power Plant MD Rts 2 & 4, P. O. Rox 1535 Lusby, Maryland 20657

Resident Inspector c/o U.S.Nuclear Regulatory Commission P. O. Box 437 Lusby, Maryland 20657

Pepartment of Natural Resources
Energy Administration, Power Plant
Siting Program
ATTN: Mr. T. Magette
Tawes State Office Building
Annapolis, Maryland 21204

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406