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August 30, 1989

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  
Request for Amendment

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Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Unit Nos. 1 & 2, respectively, with the submittal of the following proposed changes to the Technical Specifications.

The proposal involves changes to the following pages of the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal:

3/4 6-13	3/4 6-30	3/4 7-23
3/4 6-14	3/4 6-31	3/4 7-24
3/4 6-15	3/4 7-18	3/4 9-13
3/5 6-16	3/4 7-19	3/4 9-14
3/4 6-28	3/4 7-20	3/4 9-15
3/4 6-29	3/4 7-22	

#### DISCUSSION

This proposal would change the Technical Specifications covering the following systems:

Containment Iodine Removal System,  
Penetration Room Exhaust Air Filtration System,  
Control Room Emergency Ventilation System,  
Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Filtration System, and  
Spent Fuel Pool Ventilation System.

These changes mostly involve the Surveillance Requirements for the laboratory and in-place testing of the charcoal adsorbers and HEPA filters.

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There are four changes in all. Two changes are proposed for sampling and laboratory analysis of charcoal:

Change 1. Change the temperature at which the laboratory analysis is done from 130°C to 30°C for the following systems:

Penetration Room Exhaust Air Filtration,  
Control Room Emergency Ventilation,  
ECCS Pump Room Exhaust Air Filtration, and  
Spent Fuel Pool Ventilation.

A temperature of 30°C is more indicative of the accident conditions to which these adsorbers will be subjected.

Change 2. Change the requirement for obtaining charcoal samples so that only one sample is obtained for the laboratory analysis. The Technical Specifications now require that two charcoal samples be removed and tested. The intent was to remove two samples in case one became unusable, but only to test one. This change applies to all five systems.

Change 3. One change is proposed for in-place testing of the HEPA filters and charcoal adsorbers. The procedure used for the in-place testing would be changed from ANSI N510-1975 to Regulatory Guide 1.52 Regulatory Positions C.5.a, C.5.c, and C.5.d. This change is administrative in nature, would not affect the performance of the test, and has been requested by the NRC. The same sections of ANSI N510-1975 will still be used, but the Technical Specifications will reference the Regulatory Positions. This change applies to all five systems.

Change 4. One change is proposed for the surveillance which verifies isolation of the Control Room on a high radiation signal. The change would clarify that all appropriate isolation valves will be closed. It specifically causes verification that both isolation valves in each inlet duct and the common exhaust duct, and the isolation valve in the toilet area exhaust duct area, close. This change has been requested by the NRC.

### DETERMINATION OF SIGNIFICANT HAZARDS

These proposed changes have been evaluated against the standards in 10 CFR 50.92 and have been determined to involve no significant hazards considerations, in that operation of the facility in accordance with the proposed amendment would not:

- (i) involve a significant increase in the probability or consequences of an accident previously evaluated;

The change to have laboratory testing of charcoal adsorber samples performed at 30°C from 130°C does not effect probabilities. Since this more realistic testing parameter will yield more realistic test results, the evaluated accident consequences will be more accurate.

Changing our charcoal adsorber bed sample removal and testing requirement from two down to one will not effect accident probabilities or consequences.

Changing the reference for in-place testing of HEPA filters and charcoal adsorbers from ANSI N510-1975 to Regulatory Guide 1.52 Positions C.5.a, C.5.c, and C.5.d is an administrative change. The three Regulatory Positions direct us to the same ANSI N510-1975 sections that we were using all along. Therefore, this change does not effect accident probabilities or consequences.

Clarifying the requirements to periodically verify that the Control Room has been isolated on a Control Room High Radiation alarm will not effect the probabilities of any accidents and could actually reduce the potential consequences of an accident if the verification finds valves not fully closed.

- or (ii) create the possibility of a new or different type of accident from any accident previously evaluated;

None of these changes modify equipment design or operation. Therefore, none would create the possibility of a new or different accident.

or (iii) involve a significant reduction in a margin of safety.

The change to have laboratory testing of charcoal adsorber samples performed at 30°C from 130°C will cause results to be more conservative and, therefore, increases margin of safety.

Regarding changing our charcoal adsorber bed sample removal and testing requirement from two down to one, the two samples taken in the past each were a representative sample for determining the condition of the charcoal bed. Taking one sample will still give a representative sample. Current regulatory guidance and industry practice do not indicate a need for more than one sample. Margin of safety is not effected by this change.

Changing the reference for in-place testing of HEPA filters and charcoal adsorbers from ANSI N510-1975 to Regulatory Guide 1.52 Positions C.5.a, C.5.c, and C.5.d is an administrative change. The three Regulatory Positions direct us to the same ANSI N510-1975 sections that we were using all along. Therefore, this change does not effect any margin of safety.

Clarifying the requirements to periodically verify that the Control Room has been isolated on a Control Room High Radiation alarm will actually increase the margin of safety in that there is more assurance that each valve will be checked closed and, therefore, the chances that the Control Room would not be totally isolated have been reduced.

