

November 30, 1999

Mr. Charles H. Cruse, Vice-President
Nuclear Energy Division
Baltimore Gas and Electric Company
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

**SUBJECT: STAFF RESPONSE TO NOVEMBER 12, 1999 LETTER REGARDING
SPECIFIC INFORMATION NEEDED TO SUPPORT THE 10 CFR 54.29
FINDING FOR THE LICENSE RENEWAL APPLICATION FOR CALVERT
CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2**

Dear Mr. Cruse:

In your letter dated November 12, 1999, you provided to the staff a list of the commitments that provide the basis for the staff's "reasonable assurance" finding as required by 10 CFR 54.29.

We have reviewed the list of commitments and are providing comments for your consideration.

After you have reviewed our comments, we would like to arrange a call at your earliest opportunity to answer any questions that you may have regarding our comments. Please contact William Burton, the acting License Renewal Project Manager for Calvert Cliffs, at 301-415-2853, to arrange such a call.

Sincerely,

/Signed/

Christopher I. Grimes, Chief
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

cc w/enclosure

PDR ADOCK.

DF01

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NAME	E Barnhill	WF Burton	CI Grimes
DATE	11/30/99	11/30/99	11/30/99

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SECRETARY: S. Chey

CONTACT:

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5. <u>SECRETARY - DISPATCH</u>	5. _____

CAN DOCUMENT BE DELETED AFTER DISPATCH? YES _____
NO _____

SPECIAL INSTRUCTIONS: _____

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STAFF COMMENTS ON 11/12/99 FSAR INFORMATION LIST

Page	LRA	Component	Aging Effect	Program	Comment	Reviewer
1-3	3.1	Pipe Supports...	Corrosion, hydraulic vibration, thermal expansion	ARDI	ARDI is not identified in the table	Li
4	3.2	RV cooling shroud structural supports	Corrosion due to boric acid	BACI MN-3-301	2 nd paragraph of description: "...components containing boric acid," should say "... components in a borated water system." Description of the program scope should mention inspection frequency, inspector qualifications, and qualified techniques	Coffin
8-9	3.3A	Containment Tendons	Prestress Losses	STP-M-663-1/2	Program description should include a summary of the changes to the STPs.	Ashar
			General Corroision			
		Grout	Weathering			
9-10	3.3A	Containment Liner Steel components inside containment	General Corrosion	IWE/IWL	IWE and IWL should be included in the programs relied on to manage aging effects for these components	Davis
Comment					Add commitment to evaluate comtainment dome freeze-thaw damage in 2002.	Jeng

Page	LRA	Component	Aging Effect	Program	Comment	Reviewer
13	3.3C	Intake structure concrete of fluid-retaining walls and slabs, embedded steel/rebar	Aggressive chemical attack, general corrosion	PM Programs	The program description should include a summary of the changes to the STPs.	Ashar
14	3.3C	Sluice gate wire rope...	Crevice Corrosion, MIC, Pitting	Repetitive Tasks ...	Program description should include a summary of the inspection changes.	Burton
14	3.3D	Carbon steel components	Corrosion	MN-1-319	The difference between the 3 line items is unclear	Jeng
16	4.1	PP, CV,...	Wear	MN-3-301	Clarify reference to ASME XI	Coffin
16-17	4.1	PP, PUMP,...	Thermal Embrittlement	CASS Evaluation Prog.	<p>Piping and valve bodies & bonnets are managed in the same manner. Pump covers are managed differently. Therefore, they should be separated.</p> <p>Program description should reference the commitments made in the 10/22/99 letter to the staff that provides additional information to address Confirmatory Item 3.2.3.2.1-1</p>	Hiser
17-18	4.1	PP, PZV, SG HX	SCC, IGSCC, PWSCC	Alloy 600 Prog.	Add that scope of program will be increased to include all Alloy 600 base and weld metal, not just pressure boundary components	Coffin
18	4.1	SG HX	Denting, Wear, Pitting, SCC/IGSCC	STP-M-574-1/2	Should STP-O-27-1/2 also be identified as an AMP for SG tube degradation?	Banic
20	4.1	RV flange leakoff lines			Add STP-O-27-1/2 as AMP for RV flange leakoff line	Banic

Page	LRA	Component	Aging Effect	Program	Comment	Reviewer
22	4.1	Small bore piping	Fatigue	ARDI	The aging effect is cracking, not fatigue	Elliot/Hiser
24-25	4.2	RPV	Neutron Embrittlement	CRVSP	<p>The following commitments are not identified:</p> <ol style="list-style-type: none"> 1. Revise capsule withdrawal schedule to provide data at neutron fluences equal to or greater than the projected peak neutron fluence at the end of the period of extended operation 2. If the last capsule is withdrawn before the 55th year, establish reactor vessel neutron environment conditions applicable to the surveillance data and the unit's pressure-temperature curves. If the plant operates outside the limits established by these conditions, inform NRC and determine impact of condition on RPV integrity 3. If the last capsule is withdrawn before the 55th year, install neutron dosimetry to permit tracking of the fluence to the RPV 	Elliot
27	4.3	CEASB	Thermal Aging	Delta Ferrite...	Program description should explain what action will be taken if new calculations do not show that thermal aging is not plausible.	Elliot
28	4.3	CEASB, CS,...	Neutron embrittlement	ISI and MN-3-110	<p>IASCC should be added as an aging effect</p> <p>Commitments to perform inspections and follow industry program to manage IASCC & neutron embrittlement should be included in description.</p>	Elliot

Page	LRA	Component	Aging Effect	Program	Comment	Reviewer
31-32	5.1				Should add MN-1-102 for applicable components of the feedwater system	Parczewski
33	5.2	CVOPs and PCVs with air internal environment	Corrosion	IPM 10000/100001	Description should include frequency and trending	Coffin
56	5.13	PP and valves	Fatigue	EN-1-300	The 7/2/99 letter stated that the FMP would be implemented by 2003	Patnaik
49-50	5.11A			MN-1-319	The modifications described for several programs are provided in the "Program" column instead of the "Program Description" column	Burton
65 67	6.1 6.3	Cables		Not included in this listing	Listing should include a summary of the aging effects and programs for both cable types	Shemanski
General Comment					Program descriptions are not presented in a consistent format. For example, the program description for the BACI as described on page 33 of the table talks about what the procedure is used for, but the description on page 37 does not. The same is true for the program descriptions associated with the ARDI program (see page 34 vs page 37)	Coffin
General Comment					A column should be added to the table which gives a unique identifier to each line item in the table to facilitate reference.	Burton

12 2 21