

Constellation Nuclear

Calvert Cliffs Nuclear Power Plant

*A Member of the
Constellation Energy Group*

December 21, 2000

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
License Amendment Request: Revision to Technical Specification 5.2.2.e,
"Organization – Unit Staff"

REFERENCE: (a) Letter from M. Fields (NRC) to H. Ray (Southern California Edison Company), "Issuance of Amendment for San Onofre Nuclear Generating Station, Unit No. 2 (TAC No. M86191) and Unit No. 3 (TAC No. M86192)" dated February 9, 1996

Pursuant to 10 CFR 50.90, Calvert Cliffs Nuclear Power Plant, Inc. hereby requests an amendment to Renewed Operating License Nos. DPR-53 and DPR-69 to incorporate the changes described below into the Technical Specifications for Calvert Cliffs Units 1 and 2.

DESCRIPTION

The proposed amendment requests a revision to Technical Specification 5.2.2.e, "Organization – Unit Staff." The revision would consist of removing the reference to the Nuclear Regulatory Commission (NRC) Policy Statement on working hours (Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours"), and replacing it with a revised Technical Specification 5.2.2.e. The revised Technical Specification 5.2.2.e will require that administrative procedures are developed and implemented to ensure that working hours of unit staff who perform safety-related functions are limited and controlled. The revised Technical Specification is consistent with the NRC Policy Statement on working hours except that specific overtime limits and working hours will be located in plant administrative procedures.

This amendment will allow future changes to specific overtime limits and working hours to be controlled in accordance with the provisions of our established procedure control processes. This amendment is consistent with NRC's determination, on a generic basis, that such overtime limits need not be specified in the Technical Specifications (Reference a). This amendment is needed because the overtime limits

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amendment will allow us increased flexibility to change allowed working hours in the future and accommodate other safe working schedules based on 10 and 12 hour working days. The basic purpose of Generic Letter 82-12, that management ensures personnel are not assigned to shift duties while in a fatigued condition, will not be affected by this amendment.

REQUESTED CHANGES

Revise Unit Nos. 1 and 2 Technical Specification 5.2.2.e, "Organization – Unit Staff" as shown in the marked-up Technical Specification pages in Attachment (3).

SCHEDULE

The next Calvert Cliffs Unit 2 refueling outage is currently expected to begin on March 16, 2001. In order to fully benefit from the requested change for the next refueling outage, we request approval of this License Amendment by March 10, 2001. If the License Amendment Request is not approved by the requested date, we request that it be approved at the earliest opportunity.

ASSESSMENT AND REVIEW

We have evaluated the significant hazards considerations associated with this proposed amendment, as required by 10 CFR 50.92, and have determined that there are none (see Attachment 2 for a complete discussion). We have determined that operation with the proposed amendment will not result in any significant change in the types or significant increases in the amounts of any effluents that may be released offsite, and not significantly increase individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is needed in connection with the approval of the proposed change. The Calvert Cliffs Plant Operations and Safety Review Committee and Offsite Safety Review Committee have reviewed this proposed change and concur that operation with the proposed change will not result in an undue risk to the health and safety of the public.

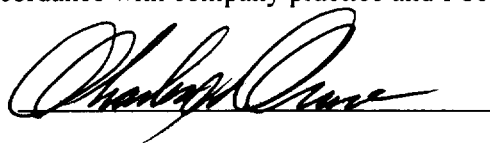
Should you have questions regarding this matter, we will be pleased to discuss them with you.

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, Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP), and that I am duly authorized to execute and file this License Amendment Request on behalf of CCNPP. 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 CCNPP 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 21 day of December, 2000.

WITNESS my Hand and Notarial Seal:


Notary Public

My Commission Expires:

February 1, 2002
Date

CHC/CDS/bjd

- Attachments: (1) Summary Description and Safety Analysis
(2) Determination of Significant Hazards
(3) Technical Specification Marked-Up Pages

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

H. J. Miller, NRC
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ATTACHMENT (1)

SUMMARY DESCRIPTION AND SAFETY ANALYSIS

ATTACHMENT (1)
SUMMARY DESCRIPTION AND SAFETY ANALYSIS

SUMMARY

Calvert Cliffs Nuclear Power Plant, Inc. requests an amendment to Calvert Cliffs Technical Specification 5.2.2.e, "Organization – Unit Staff." The existing Technical Specification 5.2.2.e, provides limits and controls concerning the amount of overtime worked by unit staff members performing safety-related functions. The proposed amendment is consistent with Nuclear Regulatory Commission's (NRC's) determination, on a generic basis, that such overtime limits need not be specified in the Technical Specifications (References 1 and 5). The current Technical Specification 5.2.2.e, states the following:

"The amount of overtime worked by unit staff members performing safety-related functions shall be limited and controlled in accordance with Nuclear Regulatory Commission (NRC) Policy Statement on working hours (Generic Letter 82-12)."

The requested amendment removes the reference to the NRC Policy Statement on working hours, and adds a requirement to develop and implement administrative procedures necessary to ensure that the working hours of unit staff who perform safety-related functions are limited and controlled. The revised Technical Specification is consistent with the NRC Policy Statement on working hours, with the exception that controls for specific overtime limits and working hours are relocated to plant administrative procedures. That will allow changes to specific overtime limits and working hours to be controlled in accordance with the provisions of our established procedure control processes. The general conditions of Generic Letter 82-12 specifying that plant management will be responsible for: (1) ensuring that personnel are not assigned to shift duties while in a fatigued condition, and (2) reviewing and authorizing deviations to established guidelines, will not be affected by this amendment. A similar amendment request was submitted by First Energy Nuclear Operating Company (formally Centerior Energy) (Reference 2) and approved by NRC on February 22, 1999 (Reference 3).

DESCRIPTION OF THE PROPOSED AMENDMENT

The proposed amendment would remove the existing Technical Specification 5.2.2.e and replace it with a new Technical Specification 5.2.2.e such that it would read:

- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Reactor Operators, health physicists, auxiliary operators, and key maintenance personnel). The procedures shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime.

Attachment (3) provides a copy of the annotated Technical Specification page.

SAFETY ANALYSIS

The function of unit staff overtime limits is to prevent situations where fatigue could reduce the ability of operating personnel to maintain the plant in a safe condition. These limits apply to plant staff who perform safety-related functions, and are established to ensure that personnel are not assigned to shift duties while in a fatigued condition that could reduce their mental awareness or decision making ability. The proposed amendment, and relocation of overtime controls to plant administrative procedures, will continue to assure that plant personnel are not assigned to shift duties while in a fatigued condition.

ATTACHMENT (1)
SUMMARY DESCRIPTION AND SAFETY ANALYSIS

As described in Calvert Cliffs Updated Final Safety Analysis Report, Chapter 1, Section 1.8, "Generic Issues," provisions governing shift staffing shall be included in plant administrative procedures. The procedures shall also restrict the use of overtime for personnel who perform safety-related functions. These restrictions are in accordance with NUREG 0737, "Clarification of TMI Action Plan Requirements," and NRC Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours." The proposed amendment to Technical Specification 5.2.2.e retains control of the use of overtime through the requirements of administrative procedures. The proposed amendment for relocating Technical Specification specific overtime limits and working hours is also consistent with the NRC guidance as discussed below.

Title 10 CFR 50.36, "Technical Specifications," establishes regulatory requirements for licensees to include in Technical Specifications as part of applications for operating licenses. In addition, the NRC's, "Final Policy Statement on Technical Specification Improvement for Nuclear Power Reactors," (Reference 4) and other NRC documents, provide guidance regarding the required content of Technical Specifications. The fundamental purpose of the plant Technical Specifications, as described in the NRC's Final Policy Statement, is to impose the necessary conditions or limitations on reactor operation to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the health and safety of the public. This is accomplished by identifying those features of controlling importance to nuclear safety and establishing certain Technical Specification conditions of operation for these features, which cannot be changed without prior NRC approval.

The NRC's Final Policy Statement recognized, as had previous statements related to NRC Staff's Technical Specification Improvement Program, that implementation of the policy would result in the relocation of some existing Technical Specification requirements to licensee-controlled documents such as the Updated Final Safety Analysis Report or Technical Requirements Manual. Items relocated to licensee-controlled documents would, in turn, be controlled in accordance with the requirements of our established change processes for those documents.

The reference to the NRC Policy Statement on working hours (Generic Letter 82-12), which discusses specific overtime limits and working hours, currently contained in Technical Specification 5.2.2.e will be removed from the Technical Specifications. The revised Technical Specification 5.2.2.e incorporates a requirement for administrative procedures necessary to ensure that the working hours of unit staff who perform safety-related functions are limited and controlled. The revised Technical Specification is consistent with the policy statement and NUREG-1434, "Standard Technical Specifications, Combustion Engineering Plants," with the exception that specific overtime limits and working hours are relocated to plant administrative procedures. Overtime will be controlled by adherence to plant administrative procedures, and changes to these plant administrative procedures are controlled in accordance with established procedural control processes.

In summary, the proposed Technical Specification 5.2.2.e change will not impact the ability of plant staff who perform safety-related functions. The proposed change will not increase fatigue nor reduce the mental alertness or decision-making ability of plant staff. This Technical Specification change is administrative and consistent with guidance from the NRC. Therefore, the proposed change will not result in undue risk to the health and safety of the public.

ATTACHMENT (1)
SUMMARY DESCRIPTION AND SAFETY ANALYSIS

REFERENCES

1. Letter from M. Fields (NRC) to H. Ray (Southern California Edison Company), "Issuance of Amendment for San Onofre Nuclear Generating Station, Unit No. 2 (TAC No. M86191) and Unit No. 3 (TAC No. M86192)" dated February 9, 1996
2. Letter from L. W. Myers (Centerior Energy) to US Nuclear Regulatory Commission, "License Amendment Request Pursuant to 10 CFR 50.90: Proposed Revision of Technical Specification 5.2.2.e, "Organization – Unit Staff," dated September 8, 1997
3. Letter from D. V. Pickett (NRC) to L. W. Myers (First Energy Nuclear Operating Company), "Amendment No. 98 to Facility Operating License No. NPF-58 – Perry Nuclear Power Plant, Unit 1 (TAC No. M99771), dated February 22, 1999
4. NRC "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (58 FR 39132), dated July 22, 1993
5. Letter from A. Hansen (NRC) to J. Wood (Centiror Service Company), "Amendment No. 212 to Facility Operating License No. NPF-3 – Davis Besse Nuclear Power Station, Unit No. 1 (TAC No. M96518), dated November 8, 1996

ATTACHMENT (2)

DETERMINATION OF SIGNIFICANT HAZARDS

ATTACHMENT (2)
DETERMINATION OF SIGNIFICANT HAZARDS

The proposed amendment to Technical Specification 5.2.2.e, "Organization - Unit Staff," removes the reference to the Nuclear Regulatory Commission Policy Statement on working hours, and adds a requirement for administrative procedures necessary to ensure that the working hours of unit staff who perform safety-related functions are limited and controlled. The specific overtime limits and working hours will be located in plant administrative procedures.

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that:

1. *The proposed licensing basis change does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The proposed change to Technical Specification 5.2.2.e only alters the administrative location of, and the regulatory controls applicable to, unit staff-specific overtime limits and working hours. Overtime limits and working hours will remain controlled by plant administrative procedures. Changes to the relocated overtime limits and working hours will be controlled in accordance with our established procedural control processes. There is no increase in the probability of an accident previously evaluated because no change is being made to any accident initiator. No previously analyzed accident scenario is changed, and initiating conditions and assumptions remain as previously analyzed.

There is no increase in the radiological consequences of any accident previously evaluated because the proposed amendment does not affect accident conditions or assumptions used in evaluating the radiological consequences of an accident. The proposed change does not alter the source term, containment isolation, or allowable radiological releases.

Therefore, the proposed amendment does not result in any increase in the probability or consequences of an accident previously evaluated.

2. *The proposed licensing basis change does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

The proposed amendment to Technical Specification 5.2.2.e only alters the administrative location of and the regulatory controls applicable to unit staff specific overtime limits and working hours. The proposed amendment does not change the way the plant is operated, and no new or different failure modes have been defined for any plant system or component important to safety. No limiting single failure has been identified as a result of the proposed amendment. No new or different types of failures, accident initiators or scenarios are introduced by the proposed amendment.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

3. *The proposed licensing basis change does not involve a significant reduction in margin of safety.*

Unit staff overtime is not an input into the calculation of any safety margin in the Technical Specification Safety Limits, Limiting Safety Settings, or other Limiting Conditions for Operation. Unit staff overtime is not an input into the calculation of any safety margin in the Technical Requirements Manual, or any other previously defined margins for any structure, system, or component important to safety. The proposed amendment to Technical Specification 5.2.2.e only

ATTACHMENT (2)
DETERMINATION OF SIGNIFICANT HAZARDS

alters the administrative location of, and the regulatory controls applicable to unit staff-specific overtime limits and working hours.

Therefore, the proposed amendment does not involve a reduction in a margin of safety.

ATTACHMENT (3)

TECHNICAL SPECIFICATION MARKED-UP PAGES

5.0-3

5.2 Organization

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A total of three non-licensed operators shall be assigned to the Units 1 and 2 shift crews.
- b. Those licensed operators counted toward minimum shift crew composition required by 10 CFR 50.54(m)(2)(i) shall be licensed for both units.
- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i), 5.2.2.a, and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be onsite when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

Delete and
replace with
insert

- e. The amount of overtime worked by unit staff members performing safetyrelated functions shall be limited and controlled in accordance with the Nuclear Regulatory Commission (NRC) Policy Statement on working hours (Generic Letter 82-12).
- f. The operations manager shall hold or have held an SRO license at Calvert Cliffs. The General Supervisor-Nuclear Plant Operations shall hold an SRO license.

Insert for Technical Specification 5.2.2.e

- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed reactor operators, health physicists, auxiliary operators, and key maintenance personnel). The procedures shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime.