## January 7, 1999

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

SUBJECT: CORRECTION OF A TYPOGRAPHICAL ERROR - LICENSE AMENDMENT NOS.

227 (UNIT 1) AND 201 (UNIT 2) (TAC NOS. MA7166 AND MA7167)

Dear Mr. Cruse:

In your letter of November 4, 1999, you requested a correction of a typographical error discovered in License Amendment Nos. 227 (Unit 1) and 201 (Unit 2) for Operating License Nos. DPR-53 and DPR-69. You indicated that the use of a letter for this type of change is allowed by the Nuclear Regulatory Commission's (NRC's) "Proposed Guidance for Correction of Technical Specification Typographical Errors," SECY-96-238, dated November 19, 1996 (The guidance in SECY-96-238 was approved in a Staff Requirements Memorandum dated December 17, 1996).

The correction of the typographical error is related to Technical Specifications (TSs) 3.4.6 and 3.4.7. TSs 3.4.6 and 3.4.7 provide conditions that must be met before a reactor coolant pump can be started in Modes 4 and 5, respectively. Those conditions are provided to ensure that a pressure excursion does not occur in the reactor coolant system (RCS) as a result of starting reactor coolant pumps when either or both steam generators are hotter than the reactor.

When Baltimore Gas and Electric Company (BGE) submitted a license amendment for adopting the Improved Standard Technical Specifications (ISTS), BGE included markups for TSs 3.4.6 and 3.4.7. These markups retained the requirement that the temperature of each steam generator must be less than or equal to 30 °F above the RCS temperature. In the approved pages for the ISTSs conversion, the term "RCS temperature" was inadvertently changed to "RCS cold leg temperature." Calvert Cliffs low temperature overpressure protection analysis uses RCS bulk average temperature, not cold leg temperature, as a criterion for this condition.

The guidance in SECY 96-238 allows for use of an administrative letter to correct a typographical error provided that 1) the error was introduced inadvertently in a particular license amendment; and 2) the erroneous change was not addressed in the notice to the public nor reviewed by the NRC staff. BGE has determined that the error occurred in License Amendment Nos. 227 and 201. This satisfied the first requirement. The use of the term "RCS temperature" with regard to starting the reactor cooling pumps was approved by the NRC in low temperature overpressure protection License Amendment Nos. 145 (Unit 1) and 131 (Unit 2). Since the wording in the markups related to TS 3.4.6 and 3.4.7 did not change in License Amendment Nos. 227 and 201, it was not subject to NRC review in those amendments and it was not identified in any notice on the amendment published in the Federal Register (63 FR 27768). This satisfied the second requirement.

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The staff has reviewed the license request to correct the typographical error in accordance with the guidance in SECY 96-238. Based on our review, as set forth above, we have determined that the use of an administrative letter to correct the typographical error is acceptable. Enclosed are the corrected TS pages.

Sincerely,

/RA/

Alexander W. Dromerick, Sr. Project Manager, Section 1 Project Directorate I Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosure: As stated

cc w/encl: See next page

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