

Charles H. Cruse
Vice President
Nuclear Energy

Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 495-4455



A Member of the
Constellation Energy Group

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US NRC

64FR 66213
Nov. 24, 1999
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January 11, 2000

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. D. L. Meyer, Chief
Rulemaking and Adjudication Staff

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Comments in Response to Notice of Revised Criteria for Post-Accident Sampling
Systems

REFERENCES: (a) Federal Register Notice 66213, Volume 64, No. 226
(b) CENPSD-1157, "Technical Justification for the Elimination of the Post-Accident Sampling System from the Plant Design and Licensing Bases for CEOG Utilities," ABB Combustion Engineering Nuclear Power, Inc., May 1999

Baltimore Gas and Electric Company reviewed the notice for revised criteria for the Post-Accident Sampling System (PASS) (Reference a) and supports the Nuclear Regulatory Commission's proposal to endorse the Combustion Engineering Owners Group (CEOG) technical justification for the elimination of PASS provided in Reference (b).

Historically, the use of information from the PASS has not been of value in accident management, as it does not provide a reliable, accurate, real-time indication of plant conditions. The development and implementation of the CEOG Severe Accident Management Guidance (SAMG), which essentially supersedes the need for a formal core damage assessment, does not rely on the PASS for performing accident management.

The regulatory requirements for the PASS can be eliminated for CEOG plants without degrading the plant emergency plan. The changes recommended in Reference (b) will result in an accident management strategy that meets the intent of the post-Three Mile Island guidance by relying on the SAMGs to manage severe accident risk, and site survey monitoring to support modification of emergency plan protective action recommendations. All essential sampling functions for a beyond-design basis event can be accomplished by non-PASS equipment.

Add. J.O'Brien

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Elimination of PASS requirements will result in reduced personnel exposure at the plant due to the elimination of maintenance and surveillance requirements associated with the system. Additional benefits include the elimination of a potential post-accident leakage path and the availability of expert resources that would otherwise be diverted to PASS activities of marginal value.

We support the conclusions of CENPSD-1157 and are confident that there is no adverse impact on the public health and safety by the elimination of PASS requirements. We urge the NRC to issue a Safety Evaluation Report that fully approves CENPSD-1157 for our use.

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

Very truly yours,



CHC/JKK/dlm

cc: R. S. Fleishman, Esquire
J. E. Silberg, Esquire
S. R. Peterson, NRC
A. W. Dromerick, NRC

H. J. Miller, NRC
Resident Inspector, NRC
R. I. McLean, DNR
J. H. Walter, PSC