

CHARLES H. CRUSE
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Nuclear Energy

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657
410 495-4455



October 6, 1997

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
Revision 7 to the License Amendment Request to Convert to the Improved
Technical Specifications (TAC Nos. M97363 and M97364)

REFERENCE: (a) Letter from A. W. Dromerick (NRC) to C. H. Cruse (BGE), dated
May 29, 1997, Request for Additional Information Regarding the
Technical Specification Change Request to Convert to the Improved
Technical Specifications (TAC Nos. M97363 and M97364)

The referenced letter transmitted questions regarding Section 3.6 of Baltimore Gas and Electric Company's application to convert to the Improved Standard Technical Specifications.

The responses for Section 3.6 are provided in Attachment 1 of this letter. Also attached to this letter is Revision 7 to the original license amendment application. These changes result from the responses provided in Attachment 1, as well as other changes identified by plant personnel. Changes to the No Significant Hazards Considerations discussions are included where appropriate.

To assist in reviewing this revision, a list describing each of the changes is provided (Attachment 2). All of the material for each change is grouped by change in Attachment (3). Attachment (4) provides the revision by Improved Technical Specification Section for ease of replacing pages in the original amendment request. Page replacement instructions are provided. All changes are marked with revision bars and are labeled Revision 7.

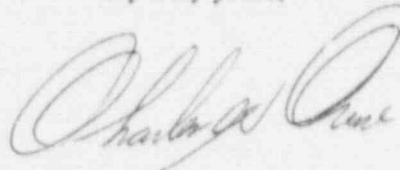
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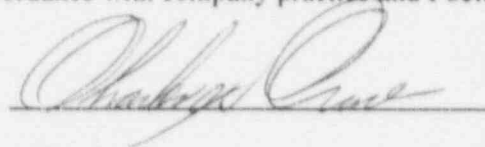
The Plant Operations and Safety Review Committee and a subcommittee of the Offsite Safety Review Committee have reviewed revisions resulting in changes to the No Significant Hazards Considerations and concur that operation with the proposed revisions will not result in an undue risk to the health and safety of the public. Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



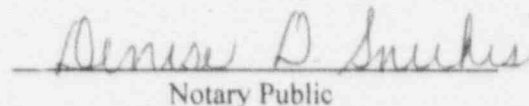
STATE OF MARYLAND :
: TO WIT:
COUNTY OF CALVERT :

I, Charles H. Cruse, being duly sworn, state that I am Vice President, Nuclear Energy Division, Baltimore Gas and Electric Company (BGE), and that I am duly authorized to execute and file this License Amendment Request on behalf of BGE. 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 BGE 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 6th day of October, 1997.

WITNESS my Hand and Notarial Seal:


Notary Public

My Commission Expires:

2/2/98
Date

CHC/PSF/dlm

- Attachments: (1) Responses to Request for Additional Information
(2) Summary of Changes
(3) Amendment Revision by Change
(4) Amendment Revision by ITS Section

cc: M. L. Reardon, NRC

(With Attachment 2 only)

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

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

ATTACHMENT (1)

IMPROVED TECHNICAL SPECIFICATIONS, REVISION 7
RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
October 6, 1997

ATTACHMENT (1)

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6**

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-1	A4	CTS 4.6.1.1.c CTS 4.6.1.1.d CTS 4.6.1.2 STS SR 3.6.1.1 ITS SR 3.6.1.1 and Associated Bases	CTS 4.6.1.1.c, CTS 4.6.1.1.d, and CTS 4.6.1.2 require leak rate testing in accordance with the Primary Containment Leakage Rate Testing Program. STS SR 3.6.1.1 requires the visual examination and leakage rate testing be performed in accordance with 10 CFR 50 Appendix J as modified by approved exemptions. ITS SR 3.6.1.1 modifies STS SR 3.6.1.1 to conform to CTS 4.6.1.1.c, CTS 4.6.1.1.d, and CTS 4.6.1.2 as modified by Amendment 219 for Unit 1 and Amendment 196 for Unit 2. The STS is based on Appendix J Option A while the CTS/ITS are based on Appendix J, Option B. Changes to the STS with regards to Option A versus Option B are covered by a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen, NEI dated 11/2/95 and TSTF 52. The ITS changes are not in conformance with the letter or TSTF 52 as modified by staff comments.	5/16/97		Licensee to update submittal with regards to 11/2/95 letter and updated TSTF 52 when OG provides revision or provides additional justification for deviations.
CCNPP Response:						
Improved Technical Specification (ITS) 3.6 will be revised to reflect the current licensing basis as approved by License Amendment Nos. 219 and 196 for Facility Operating Licenses DPR-53 and DPR-69, respectively.						
3.6.1-2	A.4	CTS 4.6.1.1.c	CTS 4.6.1.1.c which requires verifying that each containment air lock is in compliance with the requirements of CTS 3.6.1.3 is deleted. No justification is provided for this deletion. A.4 only discusses the Containment Leakage Rate Programs.	5/16/97		Provide a discussion and justification for this deletion.
CCNPP Response:						
DOC A.7 will be provided to justify the deletion. The requirement is deleted because it is a cross-reference to a requirement in another specification, so the requirement is not deleted, just the cross-reference.						

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ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-3	A.5 Bases JFD 7	CTS 3.6.1.6 ACTION a and b. ITS B3.6.1 Bases SR 3.6.1.2	Unit 1 CTS 3.6.1.6 ACTION b requires an engineering evaluation that assures the structural integrity prior to increasing RCS temperature > 200°F when the containment is not in conformance with CTS 4.6.1.6.2-End Anchorages and Adjacent Concrete Surfaces and 4.6.1.6.3-Containment Surfaces. A.5 equates this Action with CTS 3.6.1.6 ACTION a which requires a shutdown to MODE 5 in 36 hours. This comparison is incorrect. CTS 3.6.1.6 allows 90 days to restore integrity or perform the engineering evaluation, but it only applies if containment integrity does not meet the criteria of CTS 4.6.1.6.1-Containment Tendons. If the criteria of CTS 4.6.1.6.2 and CTS 4.6.1.6.3 are not met when the RCS temperature is > 200°F, then an immediate entry into CTS 3.0.3 is required. Thus the justification is wrong. A justification similar to A.3 would be more appropriate. See Item Numbers 3.6.1-4 and 3.6.1-5.	5/16/97		Provide additional discussion and justification for this Administrative change. See Item Number 3.6.1-4 and 3.6.1-5.

CCNPP Response:

DOC A.5 will be revised to more accurately describe the change and provide additional justification.

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ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-4	LA.1 L.1 Bases JFD 7	CTS 3.6.1.6 ACTION a. ITS B3.6.1 Bases-SR 3.6.1.2	Unit 1 CTS 3.6.1.6 ACTION a allows 90 days to restore containment tendon integrity or perform an engineering evaluation that assures the structural integrity when the containment tendons are not in conformance with CTS 4.6.1.6.1. This requirement is being moved to ITS B3.6.1 BASES - SR 3.6.1.2. The relocation of this requirement to ITS B3.6.1 BASES SR 3.6.1.2 is unacceptable. ITS 3.6.1 ACTIONS require containment be restored to OPERABLE status within 1 hour or shutdown to MODE 5 in 36 hours. It does not allow 90 days to restore or perform an engineering evaluation. Therefore, the 90 days is considered as an Allowed Outage Time (AOT) specific to Unit 1 CCNPP and would require appropriate Conditions, RAs, and Completion Times. See Item Numbers 3.6.1-3 and 3.6.1-5.	5/16/97		Either delete this requirement and provide discussion and justification for this deletion (More Restrictive (M)), or provide the appropriate Conditions, RAs and Completion Times in ITS 3.6.1 as well as appropriate discussion and justification for this administrative change. See Item Numbers 3.6.1-3 and 3.6.1-5.

CCNPP Response:

The actions associated with the Containment Tendon Program will be moved to the Technical Requirements Manual, controlled under 10 CFR 50.59, and appropriate justifications will be provided.

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**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
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ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-5	LA.1 L.1 Bases JFD 7	Unit 1 CTS 3.6.1.6 ACTIONS a and b Unit 2 CTS 3.6.1.6 ACTION ITS B3.6.1 BASES- SR 3.6.1.2	Unit 1 CTS 3.6.1.6 ACTION a allows 90 days to restore containment tendon integrity or perform an engineering evaluation that assures the structural integrity when the containment tendons are not in conformance with CTS 4.6.1.6.1. This requirement is being moved to ITS B3.6.1 Bases-SR 3.6.1.2. The unacceptability of the relocation is discussed in Item Number 3.6.1-4. However, retention of this requirement in the ITS in the form it is now is unacceptable. Unit 1's current licensing basis has this AOT requirement applying only to containment tendons (CTS 3.6.1.6 ACTION a/CTS 4.6.1.6.1), not to end anchorages and adjacent concrete surfaces (CTS 3.6.1.6 ACTION b/CTS 4.6.1.6.2) and containment surfaces (CTS 3.6.1.6 ACTION b/CTS 4.6.1.6.3) and see Item Numbers 3.6.1-3. In addition, Unit 2 CTS 3.6.1.6 ACTION does not include this requirement. Unit 2 CTS 3.6.1.6 ACTIONS allows 24 hours to restore integrity, not 90 days. Furthermore, Unit 2 changes the 24 hours change. Therefore, to implement this change as proposed would require a staff evaluation with regards to CTS 3.6.1.6 ACTION b and Unit 2 CTS 3.6.1.6 ACTION. This is beyond the scope of review for this conversion.	5/16/97		Either delete this requirement and provide discussion and justification for this deletion (More Restrictive (M)) or provide, only for Unit 1 containment tendons inoperable, the appropriate Conditions, RAs, and Completion Times as well as appropriate discussion and justification for this Administrative/Less Restrictive change. See Item Numbers 3.6.1-3, and 3.6.1-4.

CCNPP Response:

The actions associated with the Containment Tendon Program will be moved to the Technical Requirements Manual, controlled under 10 CFR 50.59, and appropriate justifications will be provided.

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ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-6	None	CTS 4.6.1.1.d ITS 5.5.1.6	CTS 4.6.1.1.d was added by Unit 1 Amendment No. 221 and Unit 2 Amendment No. 197 to allow use of blind flanges for the Containment Purge System instead of the two outboard 48 inch isolation valves during MODES 1 to 4. Insert A in the CTS markup differs from the staff approved amendments (197 and 221) and the insert 5.5.16 in ITS 5.5.1.6.	5/16/97		Correct this discrepancy.

CCNPP Response:

Insert A will be marked to match the approved Amendments.

3.6.1-7	Bases None	ITS 5.5.6 ITS B3.6.1 Bases REFERENCES	ITS B3.6.1 Bases-REFERENCES lists Reference 4 as Regulatory Guide 1.35 Revision 0, while ITS 5.5.6 specifies Revision 2 of the same document.	5/16/97		Correct this discrepancy.
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CCNPP Response:

The Bases will be corrected to reference Revision 2.

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2-1	A.5	CTS 4.6.1.3a ITS B3.6.2 BASES	See Item Number 3.6.1-1	5/16/97		See Item Number 3.6.1-1.

CCNPP Response:

Improved Technical Specification 3.6 will be revised to reflect the current licensing basis as approved by License Amendment Nos. 219 and 196 for Facility Operating Licenses DPR-53 and DPR-69, respectively.

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3.6.2-1	A.5	CTS 4.6.1.3a ITS B3.6.2 BASES	See Item Number 3.6.1-1	5/16/97		See Item Number 3.6.1-1.
3.6.2-2	L.2	CTS 3.6.1.3 ACTION b ITS 3.6.2 ACTION A and C and Associated Bases	CTS 3.6.1.3 ACTION b requires that when an air lock is inoperable as a result of an inoperable door gasket, that the OPERABLE door of the air lock be maintained locked closed and sealed, and the air lock restored to OPERABLE status within 7 days. L.2 states that the appropriate ACTION to follow in this case is ITS 3.6.2 ACTION A. This is incorrect. The appropriate ACTION to enter in this condition is ITS 3.6.2 ACTION C. The basis for this is found in ITS B3.6.2 BASES RA C.1. Thus the change becomes a more restrictive change. See Item Number 3.6.2-3.	5/16/97		Provide additional justification and discussion for this More Restrictive change. See Item 3.6.2-3.

CCNPP Response:

If one air lock door is inoperable due to a failed seal, Condition A is the appropriate condition to enter. However, if one seal per door has failed (one of the two seals in each door has failed, such that both doors would be considered inoperable), then Condition C is the correct condition to enter. The L.2 DOC is correct in describing applicable conditions and change categorization.

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3.6.2-3	L.4	CTS 3.6.1.3 ACTION B ITS 3.6.2 RA A Note 2	ITS 3.6.2 ACTION RA A contains a Note 2 which allows entry and exit into containment for seven days under administrative controls if both air locks are inoperable. The justification L.4 uses CTS 3.6.1.3.b as part of the basis for adding this Note. Bases on Item Number 3.6.2-2, L.4 is incorrect.	5/16/97		Provide additional justification and discussion for this Less Restrictive change.
CCNPP Response:						
If one air lock door is inoperable due to a failed seal, Condition A is the appropriate condition to enter. However, if one seal per door has failed (one of the two seals in each door has failed, such that both doors would be considered inoperable), then Condition C is the correct condition to enter. The L.2 DOC is correct in describing applicable conditions and change categorization. DOC L.4 will be enhanced to provide additional justification.						
3.6.2-4	None	STS 3.6.2 Bases SR 3.6.2.2 ITS B3.6.2 Bases SR 3.6.2.2	Changes are made to STS B3.6.2 Bases SR 3.6.2.2 to bring it into conformance with TSTF-17. The changes made do not conform to the approved version of TSTF0-17.	5/16/97		Licensee to update submittal with regards to TSTF-17 or provide additional discussions and justifications for the deviations.
CCNPP Response:						
JFD-16 will be provided to justify the deviations from TSTF-17 Revision 1.						

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ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-1	A.5	CTS 3.6.4.1 ITS 3.6.3	ITS 3.6.3 will contain an ACTIONS Note 2 which allows separate condition entry for each penetration flow path. CTS 3.6.4.1 ACTIONS do not contain this requirement. The justification states that the Note is consistent with the intent of the CTS ACTIONS for the containment air locks. This is incorrect. The justification needs to be consistent with the CTS for containment isolation valves, since the same change was done for containment air locks.	5/16/97		Provide additional discussion and justification for this Administrative change.
CCNPP Response:						
DOC A.5 will be modified to clarify that the actions are consistent with the intent of the existing actions for the containment isolation valves.						
3.6.3-2	M.2 BASES JFD 6	CTS 3.6.4 ACTIONS ITS 3.6.3 RA B.2 and Associated BASES	ITS 3.6.3 RA B.2 contains requirements to verify the affected penetration flow path is isolated once per 31 days for isolation devices outside Containment. ITS 3.6.3 RA B.2 contains an additional requirement for isolation devices inside Containment to verify the affected penetration flow path is isolated prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days. ITS 3.6.3 RA B.2 is modified by a Note allowing isolation devices in high radiation areas verified administratively. CTS 3.6.4.1 does not contain this allowance. The STS markup for ITS 3.6.3 RA B.2 references TSTF-145 as justification for adding RA B.2. The changes to ITS B3.6.3 Bases-RA B.1 and B.2 is not in accordance with TSTF 145 as modified by the staff.	5/16/97		Licensee to update submittal in accordance with TSTF-145 as modified by the staff or provide additional discussion and justification for the deviations.
CCNPP Response:						
Changes associated with TSTF-145 were removed as part of ITS supplemental Amendment Request Revision 1 dated June 9, 1997.						

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ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-3	M.3 L.5 JFD 5 BASES JFD 6	CTS 3.6.1.1 *Footnote	See Item Number 3.6.7-1	5/16/97		See Item Number 3.6.7-1
CCNPP Response:						
DOC L.1 for ITS 3.6.7 will be revised to better explain that the allowance for the plant to operate with both hydrogen recombiners inoperable under the conditions specified is acceptable based on having an alternate hydrogen control system acceptable to the Nuclear Regulatory Commission technical staff.						
3.6.3-4	LA.2	CTS 4.6.4.1.1	The post-maintenance testing required by CTS 4.6.4.1.1 is not contained in ITS 3.6.3. Rather, this requirement is moved into plant procedures. This places requirements outside of the ITS into Licensee controlled documents. There is not an adequate discussion and justification of how specific post-maintenance testing requirements are addressed and controlled by plant procedures.	5/16/97		Provide a description of the plant procedures to which the post-maintenance testing requirements are relocated and the change control process for these procedures.
CCNPP Response:						
DOC L.10 will be provided to justify deletion of these requirements.						

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ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-5	L.3	CTS 4.6.1.1.a and Associated **Footnote ITS SR 3.6.3.2 ITS SR 3.6.3.3 and Associated Bases	CTS 4.6.1.1.a requires verifying once per 31 days that all penetrations not capable of being closed by OPERABLE containment automatic isolation valves, but that are required to be closed during accident conditions, are closed by valves, blind flanges, or deactivated automatic valves secured in their positions. Footnote** to CTS 4.6.1.1 excepts those valves, blind flanges, or deactivated automatic valves located inside containment from the 31 day verification frequency, but specifies that they must be verified during each MCDE 5 if not performed in the previous 92 days. ITS SRs 3.6.3.2 and 3.6.3.3 require performing the same verification. However, they are modified by a Note which allows verifying valves, blind flanges, or equivalent in high radiation areas by administrative means. The CTS markup for CTS 4.6.1.1.a inserts the phrase "and are not locked, sealed, or otherwise secured." There is no discussion or justification provided for inside containment; not all valves or valves outside containment which is not the focus of L.3. See Item Number 3.6.3-13.	5/16/97		Provide additional discussion and justification for adding the phrase "and are not locked, sealed, or otherwise secured" to CTS 4.6.1.1.a. See Item Number 3.6.3-13.
<p>CCNPP Response:</p> <p>DOC L.4 will be enhanced, and DOC L.3 will be withdrawn.</p>						

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ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-6	L.6 L.7	CTS 4.6.1.1.a CTS 3.6.4.1 ACTION C ITS 3.6.3 RA A.1 ITS 3.6.3 RA B.1 ITS 3.6.3 RA C.1 ITS SR 3.6.3.2 ITS SR 3.6.3.3 and Associated Bases	CTS Surveillance Requirement 4.6.1.1.a requires all penetrations not capable of being closed by OPERABLE CIVs, and are required closed during accident conditions, are verified closed by valves, blind flanges, or deactivated automatic valves secured in their positions. ITS 3.6.3 RA A.1, ITS 3.6.3 RA B.1, ITS 3.6.3 RA C.1, ITS SR 3.6.3.2 and ITS SR 3.6.3.3 allow penetrations to be isolated by an equivalent isolation device. The STS markup for this change references CEOG-112. CEOG-112 is TSTF 196 which has been rejected by the staff.	5/16/97		Delete this change.
CCNPP Response:						
Changes associated with TSTF-196 will be removed and appropriate justifications provided.						
3.6.3-7	Bases JFD 3	ITS B.3.6.3 Bases- RA C.1 and C.2	ITS B.3.6.3 Bases- RA C.1 and C.2 last paragraph has no changes associated with it. Yet it is marked with Bases JFD 3.	5/16/97		Correct this discrepancy.
CCNPP Response:						
The JFD-3 reference will be removed.						
3.6.3-8	None	CTS 3.6.4.1 ACTIONS ITS 3.6.3 Conditions A and B and Associated Bases.	CTS 3.6.4.1 ACTIONS adds a Note to bring the CTS into conformance with ITS 3.6.3 Conditions A and B. No justification is provided for this administrative change.	5/16/97		Provide a discussion and justification for this administrative change.
CCNPP Response:						
DOC A.9 addressed this change as part of ITS supplemental Amendment Request Revision 1 dated June 9, 1997.						

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ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-9	None	CTS 3.6.4.1 ACTIONS ITS 3.6.3 Condition C and Associated Bases	CTS 3.6.4.1 ACTIONS adds a Note to bring the CTS into conformance with ITS 3.6.3 Condition C. No justification is provided for this administrative change. See Item Number 3.6.3-12.	5/16/97		Provide a discussion and justification for this administrative change. See Item Number 3.6.3-12.
CCNPP Response: DOC A.9 addressed this change as part of ITS supplemental Amendment Request Revision 1 dated June 9, 1997.						
3.7.3-10	None	CTS 4.6.4.1.1 # Footnote	CTS 4.6.4.1.1 # Footnote is being moved from CTS 3.6 to ITS 3.3.7 "Containment Radiation Signal." No justification is provided for this administrative change.	5/16/97		Provide a discussion and justification for this administrative change.
CCNPP Response: This change is addressed by DOC A.1.						
3.6.3-11	None	CTS 4.6.1.1.b, 4.6.1.1.c, and 4.6.1.1.d	CTS 4.6.1.1.b, 4.6.1.1.c, and 4.6.1.1.d are being moved from CTS 3.6 to ITS 5.5.16. No justification is provided for this administrative change.	5/16/97		Provide a discussion and justification for this administrative change.
CCNPP Response: This change is addressed by DOC A.1.						
3.6.3-12	None	STS 3.6.3 Condition C ITS 3.6.3 Condition C and Associated Bases	ITS 3.6.3 Condition C modifies STS 3.6.3 Condition C and associated Note to include more than one containment isolation valve in a closed system. The change is designated CEOG-106. It is the staff's understanding that this change is not generic and has been withdrawn from the generic review process, but will be submitted as a plant specific change.	5/16/97		Provide a discussion and justification based on current licensing basis, system design, or operational constraints.
CCNPP Response: JFD 10 was added to address this change as part of ITS supplemental Amendment Request Revision 1 dated June 9, 1997.						

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3.6.3-13	None	STS SR 3.6.3.3 STS SR 3.6.3.4 and Associated Bases ITS SR 3.6.3.2 ITS SR 3.6.3.3 and Associated Bases	STS SR 3.6.3.3, SR 3.6.3.4 and their associated Bases have been modified by TSTF 45 Rev. 1. ITS SR 3.6.3.2 and SR 3.6.3.3 have incorporated TSTF 45. However, their associated bases are not in accordance with TSTF-45.	5/16/97		Licensee to update submittal in accordance with TSTF 45 Rev 1 or provide additional discussion and justification for the bases deviation.
CCNPP Response:						
TSTF-145 Revision 1 will be incorporated into the ITS submittal.						

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
No comments for 3.6.4.						

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IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6**

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.5-1	LA 2	CTS 4.6.1.5 ITS B3.6.2 BASES SR 3.6.5.1	CTS 4.6.1.5 requires determining the containment average air temperature as the arithmetical average of the temperature at the containment dome and the containment reactor cavity. ITS SR 3.6.5.1 requires determining the primary containment average air temperature, but does not specify temperature indication locations. The temperature indication locations are moved into the Bases and plant procedures. ITS B.3.6.2 Bases-SR 3.6.5.1 does not specify the temperature indication locations, nor is it specified elsewhere in ITS B3.6.5. The specific plant procedures and associated controls are not indicated.	5/16/97		Specify the temperature indicator locations in ITS B3.6.5 BASES-SR 3.6.5.1. Provide a description of the plant procedure to which the temperature indication locations are relocated and the change control process for these procedures.

CCNPP Response:

The detail will be moved to the Bases and appropriate justification changes will be made.

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3/4.6.5.1-1	None	CTS 3/4.6.5.1	CTS 3/4.6.5.1 is being moved to ITS 3.3.10 "Post Accident Monitoring Instrumentation." No justification has been provided for this Administrative change.	5/16/97		Provide a discussion and justification for this Administrative change.

CCNPP Response:

DOC A.1 was provided for this change.

ATTACHMENT (1)

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6**

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.7-1	L.1 Bases JFD 2	CTS 3.6.5.2 ITS 3.6.7 ACTION B and Associated Bases	<p>CTS 3.6.5.2 does not specify an ACTION when two hydrogen recombiners are inoperable. Therefore, if two hydrogen recombiners are inoperable, a shutdown per LCO 3.0.3 is required. ITS 3.6.7 Condition B adds Required Actions and Completion Times for two hydrogen recombiners inoperable. However, instead of requiring entry into the LCO 3.0.3 shutdown track as in CTS 3.5.6.2, ITS 3.6.7 ACTION B allows 7 days to restore one hydrogen recombiner to OPERABLE status when two are inoperable. ITS 3.6.7 ACTION B also requires administratively verifying the hydrogen control function within 1 hour after both hydrogen recombiners become inoperable, and every 12 hours thereafter. ITS B3.6.7 Bases-RA B.1 and B.2 and justification L.1 state that the hydrogen control function is provided by Containment Vent/Hydrogen Purge System. However, CTS 3.6.1.1 *Footnote (justification M.3 in ITS 3.6.3) only allows the Containment Vent/Hydrogen Purge System to be open in MODES 1 to 4 for containment pressure control, airborne radioactivity control, and surveillance testing purposes, not for hydrogen control functions. Thus it would seem that ITS 3.6.7 ACTION B does not apply to CCNPP.</p>	5/16/97		<p>Provide additional discussion and justification based on current licensing basis, system design, or operational constraints as well as appropriate documentation to show that ITS 3.6.7 ACTION B applies to CCNPP and the CTS is in error.</p>

CCNPP Response:

DOC L.1 for ITS 3.6.7 will be revised to better explain that the allowance for the plant to operate with both hydrogen recombiners inoperable under the conditions specified is acceptable based on having an alternate hydrogen control system acceptable to the Nuclear Regulatory Commission technical staff.

ATTACHMENT (1)

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.7-2	L.2	CTS 4.6.5.2.a STS SR 3.6.8.1 and Associated Bases ITS SR 3.6.7.1 and Associated Bases	CTS 4.6.5.2.a requires verifying that during a functional test of the hydrogen recombiner, the minimum heater sheath temperature increases to > 700°F within 90 minutes, and is maintained for at least 2 hours once per 6 months. ITS 3.6.7 does not contain this requirement. Rather, ITS SR 3.6.7.1 (hydrogen recombiner functional test) is a 24-month functional test which requires the heater sheath temperature to be increased to > 1200°F within 5 hours, and maintained for at least 4 hours. No justification is provided for changing the test parameters from a heater sheath temperature of >700° within 90 minutes and is maintained for at least 2 hours to > 1200°F to within 5 hours and maintained for at least 4 hours. STS B3.6.8 Bases-SR 3.6.8.1 has a testing requirement similar but less restrictive than CTS 4.6.5.2.a. It does not maintain the temperature for 2 hours, but increases it to maximum for approximately 2 minutes and verified to be >60 kw	5/15/97		Provide additional discussion and justification based on current licensing basis, system design or operational constraints to justify the deviation from the CTS and STS.
<p>CCNPP Response:</p> <p>DOC L.2 will be revised to provide additional justification for deletion of Current Technical Specification Surveillance Requirement 4.6.5.2.a.</p>						

ATTACHMENT (1)

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6**

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.7-3	Bases JFD 10	STS B3.6.8 Bases- RA B.1 and B.2 ITS B3.6.7 Bases RA B.1 and B.2	STS B3.6.7 Bases RA B.1 and B.2 has a reviewer's Note in the text. ITS B3.6.7 Bases RA B.1 and B.2 deletes the Note using justification Bases JFD 10. Bases JFD 10 deals with the compliance of CCNPP to the General Design Criteria (GDC). The deletion of the Reviewer's Note has nothing to do with the GDC.	5/16/97		Provide additional discussion and justification for the deletion of the Reviewer's Note.
CCNPP Response:						
The JFD 10 notation will be revised to JFD 9.						

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**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6**

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.8-1	BASES JFD 3	STS B3.6.10 BASES SR 3.6.10.2 ITS B3.6.8 Bases- SR 3.6.8.2 ITS B3.6.8 BASES REFERENCES	STS B3.6.10 Bases for SR 3.6.10.2 states that "The ICS filter tests are in accordance with Regulatory Guide (RG) 1.52 (Ref. 3). "ITS B3.6.8 Bases for SR 3.6.8.2 deletes this statement and Reference 3 from ITS B.3.6.8 Bases REFERENCE Section. The basis for this deletion is that it was performed to ensure that the references are applicable to CCNPP. The testing requirements in CTS 4.6.3.1.b thru g reference RG 1.52 Rev. 2 and are relocated to ITS 5.5.11. ITS 5.5.11 states that the VFTP test shall be done in accordance with RG 1.52 Rev. 2. Therefore, the justification JFD 3 is wrong, and the STS statement and Reference 3 should be reinserted into ITS B3.6.8 Bases SR 3.6.8.2 and ITS B.3.6.8 Bases REFERENCES, respectively. Furthermore, the staff would consider this change as a generic change.	5/16/97		Reinsert the STS statement and Ref. 3 into the appropriate place in ITS B.3.6.8 Bases SR 3.6.8.2 and ITS B.3.8 Bases REFERENCES.

CCNPP Response:

JFD 15 will be provided for justification for deleting the reference in ITS 3.6.8 Bases, because all the filter trains are not in full conformance with Regulatory Guide 1.52 Revision 2, and the change is not generic since it is made to be consistent with current licensing basis.

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**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6**

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.8-2	Bases JFD 8 JFD 11	STS B3.6.10 Bases- LCO ITS B3.6.8 BASES- BACKGROUND ITS B3.6.8 Bases LCO	STS B3.6.10 Bases-LCO states the following: "Two separate, independent, and redundant trains..." ITS B3.6.8 Bases-LCO deletes the words "separate, independent and redundant." ITS B3.6.8 BACKGROUND first sentence, second paragraph retains these words. The justifications (Bases JFD 8 and JFD 11) deal with consistency with CCNPP specific number, system name, terminology, safety analysis, plant system operation or design basis. This deletion does not fall under any of these categories.	5/16/97		Provide a discussion and justification for this deletion.
CCNPP Response:						
The ISTS Bases markup for ITS 3.6.8 will be revised to state that the three trains of the iodine removal system are separate, independent (except for power), and redundant, in accordance with the current licensing basis, as stated in the Safety Evaluation dated August 28, 1972.						
3.6.8-3	Bases JFD 8	STS 3.6.10 Bases - SR 3.6.10.1 ITS 3.6.8 Bases- BACKGROUND ITS B3.6.8 Bases- SR 3.6.8.1	STS 3.6.10 Bases-SR 3.6.10.1 states that the SR requirement to OPERATE each ICS train ensures that all trains are OPERABLE. "It also ensures that blockage, fan or motor failure or excessive vibration can be detected for corrective action." This last statement has been deleted from ITS B3.6.8 - Bases for SR 3.6.8.1. The justification (Bases JFD 8) provided does not correlate to this sentence, based on the system description provided in ITS B3.6.8 Bases-BACKGROUND.	5/16/97		Provide a discussion and justification for this deletion.
CCNPP Response:						
The statement will be retained in the ITS Bases.						

ATTACHMENT (2)

IMPROVED TECHNICAL SPECIFICATIONS, REVISION 7

SUMMARY OF CHANGES

ATTACHMENT (2)

SUMMARY OF CHANGES

1. The Nuclear Regulatory Commission (NRC) requested additional justification for deviating from a yet to be issued revision of TSTF-52, and a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen dated November 2, 1995. To resolve these comments, the Improved Technical Specification (ITS) was revised to reflect the current licensing basis as approved by the NRC in License Amendment Nos. 219 and 196 for Facility Operating License Nos. DPR-53 and DPR-69, respectively. While resolving these comments the following were discovered: 1) the Current Technical Specification (CTS) Markup for CTS 4.6.1.2 a for ITS 3.6.1 was not consistent with the issued License Amendments; 2) the acceptance criteria for the leakage rate tests provided in the Improved Standard Technical Specification (ISTS) Bases for ITS Surveillance Requirement (SR) 3.6.1.1 was incorrect; and 3) the Markups for CTS 4.6.1.3.a for ITS 3.6.2 were not consistent with the ISTS Markup for ITS 3.6.2 SR 3.6.2.1. To resolve these issues, the following changes were made: 1) the Markups for CTS 4.6.1.2 and CTS 4.6.1.3.a were revised; 2) Discussion of Change (DOC) A.5 was revised to justify the addition of Notes 1 and 2 of ITS SR 3.6.2.1; 3) the references to TSTF-52 were removed from the ISTS Markups for ITS 3.6.1, 3.6.2, and 3.6.3 and the deviations were justified by new Justification for Deviation (JFD) 11 for ITS 3.6; 4) the references to TSTF-52 were removed from the ISTS Bases Markups for ITS 3.6.1, 3.6.2, and 3.6.3. These deviations were justified by exiting JFDs 6 and 8, and new JFD 17 for Bases Section 3.6; and 5) the ISTS Bases Markup for ITS SR 3.6.1.1 were revised to provide the correct acceptance criteria. (Comments 3.6.1-1 and 3.6.2-1)
2. The NRC requested justification for the deletion of CTS SR 4.6.1.1.b. The justification has been provided in DOC A.7 for ITS 3.6.1. (Comment 3.6.1-2)
3. The NRC questioned the validity of the justification provided for the elimination of Action b of CTS 3.6.1.6. Discussion of Change A.5 for ITS 3.6.1 was revised to provide the appropriate justification. (Comment 3.6.1-3)
4. In the CTS Markup of Action a of Unit 1 CTS 3.6.1.6, we proposed to move to the Bases the requirement to perform an engineering evaluation to demonstrate the ability of the containment structure to perform its function, in the event the containment structure was exhibiting evidence of possible abnormal degradation. The NRC did not believe this was appropriate. To resolve the NRC Comments, the following changes were made: 1) DOC LA.1 was revised to state that the requirement would be moved to the Technical Requirements Manual (TRM) versus the Bases. This is appropriate, because the requirement only applies when the operability of the containment is indeterminate. If the containment is determined to be inoperable, then prompt action should be taken to either restore the containment or to place the plant in a safe condition; and 2) the ISTS Bases Markup for ITS SR 3.6.1.2 were revised to eliminate the discussion regarding the engineering evaluation. (Comments 3.6.1-4 and 3.6.1-5)
5. The NRC identified that Insert A provided in the Markups of CTS SR 4.6.1.1.d for ITS 3.6.1 did not match Insert 5.5.16 provided in the CTS Markups for ITS Section 5.0 and the revised surveillances issued in License Amendment Nos. 221 and 197. Insert A provided in the Markups of CTS SR 4.6.1.1.d for ITS 3.6.1 has been revised to be consistent with Insert 5.5.16 and the revised surveillances issued in License Amendment Nos. 221 and 197. (Comment 3.6.1-6)
6. The NRC identified that the reference to the revision of Regulatory Guide 1.35 contained in the ISTS Bases Markup for ITS 3.6.1 was different than the revision of Regulatory Guide 1.35

ATTACHMENT (2)

SUMMARY OF CHANGES

referenced in ITS 5.5.6. The revision referenced in ITS 5.5.6 is correct, so the reference in the ISTS Bases Markup for ITS 3.6.1 was revised to reference Revision 2, versus Revision 0. (Comment 3.6.1-7)

7. Discussion of Change L.4 for ITS 3.6.2 was enhanced to provide additional clarification. This proposed change was required to respond to an NRC comment. (Comment 3.6.2-3)
8. The NRC identified that the ISTS Bases Markup for ITS SR 3.6.2.2 did not match the wording approved in TSTF-17, Revision 1. The NRC is correct. However, the TSTF-17 wording contained several technical errors. Justification for Deviation 16 for Bases Section 3.6 has been provided to justify the deviations from the approved TSTF-17 wording. (Comment 3.6.2-4)

The NRC requested that DOC A.5 for ITS 3.6.3 be revised to address the containment isolation valves, instead of the containment air locks. Discussion of Change A.5 for ITS 3.6.3 was revised as requested. (Comment 3.6.3-1)

10. The NRC was concerned that adding Action B of ISTS 3.6.8 to CTS 3/4.6.5.2 conflicted with Footnote * to CTS Limiting Condition for Operation (LCO) 3.6.1.1. Discussion of Change L.1 for ITS 3.6.7 was revised to include additional discussion and justification for the change. The associated no significant hazards considerations (NSHC) did not require revision. (Comments 3.6.3-3 and 3.6.7-1)
11. Current Technical Specification SR 4.6.4.1.1 provides requirements to demonstrate the operability of each containment isolation valve prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit. Originally, we proposed to relocate this SR to procedures. Now, we are proposing to delete the SR. Justification for deleting the SR is provided as DOC L.10 (and its associated NSHC) for ITS 3.6.3. To support this change, DOC LA.2 was deleted, because it is no longer used. (Comment 3.6.3-4)
12. The NRC requested additional justification regarding a change to CTS SR 4.6.1.1.a identified in the CTS Markups for ITS 3.6.3. To resolve this question the following changes were made: 1) the Markups of CTS SR 4.6.1.1.a for ITS 3.6.3 were revised to reference DOC L.4 for ITS 3.6.3 as the justification for change and to delete the reference to DOC L.3 for ITS 3.6.3; 2) DOC L.4 and its associated NSHC for ITS 3.6.3 were revised to ensure that the change to CTS 4.6.1.1.a and Footnote ** to CTS 4.6.1.1.a were clearly discussed and justified; and 3) DOC L.3 and its associated NSHC were deleted. DOC L.3 for ITS 3.6.3 addressed a different change, that was also addressed by DOC L.5 for ITS 3.6. (Comment 3.6.3-5)

While resolving the aforementioned NRC Comment, it was discovered that the Markups of CTS 4.6.1.1.a and Footnote ** of CTS 4.6.1.1.a for ITS 3.6.3 did not properly cross-reference the ITS requirements. Thus, the Markups of CTS 4.6.1.1.a and Footnote ** of CTS 4.6.1.1.a for ITS 3.6.3 were revised to properly cross-reference the ITS requirements. Also, the ISTS Markup for ITS 3.6.3 was revised to properly cross-reference the CTS requirements.

13. The NRC requested that the deviations proposed by CEOG-112 (TSTF-196) be withdrawn from the Calvert Cliffs' submittal. The deviations proposed by CEOG-112 were withdrawn from the

ATTACHMENT (2)

SUMMARY OF CHANGES

- submittal as requested. The following changes were required: 1) the Markups for Action c of CTS LCO 3.6.4.1 for ITS 3.6.3 were revised; 2) the Markups for CTS 4.6.1.1.a for ITS 3.6.3 were revised; 3) DOC L.6 and its associated NSHC for ITS 3.6.3 were deleted, because they are no longer used; 4) DOC L.7 and its associated NSHC for ITS 3.6.3 were revised; and 5) the ISTS Markups for ITS 3.6.3 and its Bases were revised. (Comment 3.6.3-6)
14. The NRC requested that the ISTS Bases Markup for ITS 3.6.3 be revised by deleting a reference to JFD 3 for Bases Section 3.6 that was placed next to the last paragraph of the Bases for Required Actions C.1 and C.2. The ISTS Bases Markup for Required Actions C.1 and C.2 of ITS 3.6.3 was revised as requested. (Comment 3.6.3-7)
 15. The NRC requested that the ISTS Bases Markup for ITS SRs 3.6.3.2 and 3.6.3.3 be revised to accurately reflect Revision 1 of TSTF-45. The ISTS Bases Markup for ITS SRs 3.6.3.2 and 3.6.3.3 were revised to reflect Revision 1 of TSTF-45. (Comment 3.6.3-13)
 16. Discussion of Change LA.2 for ITS 3.6.5 was revised to state that the specific locations for measuring containment air temperature are being moved to the Bases. The ISTS Markup of the Bases for ITS 3.6.5 was revised to include the required information. These changes have been made to respond to an NRC Comment. (Comment 3.6.5-1).
 17. The NRC had several questions regarding the justifications for changes to CTS 4.6.2.1.a.1, CTS 4.6.2.1.b.1, and 4.6.2.1.c.1. Additionally, while resolving these NRC Comment, additional problems with the Markups of the SRs of CTS 4.6.2.1 and the DOCs for ITS 3.6.6 were identified. The following changes were required to resolve these comments: 1) the Markups of the SRs for CTS 4.6.2.1 for ITS 3.6.6 were revised; 2) DOCs A.5, M.1, LA.4, LA.5, and L.5 for ITS 3.6.6 were revised; 3) DOCs A.6, A.7, and L.7 (and its associated NSHC) for ITS 3.6.6 were added; 4) DOC L.4 for ITS 3.6.6 was deleted; 5) the ISTS Markups for ITS 3.6.6 were revised; and 6) the ISTS Bases Markups for SRs 3.6.6.5, 3.6.6.6, and 3.6.6.7 were revised. (Comments 3.6.6-1, 3.6.6-2, 3.6.6-3, and 3.6.6-7)
 18. Discussion of Change LA.3 for ITS 3.6.6 was revised to state that the requirement for the service water outlet valves to be full open has been moved to the Bases. The ISTS Markup of the Bases for ITS 3.6.6 was revised to include the required information. These changes have been made to respond to an NRC Comment. (Comment 3.6.6-5)
 19. The NRC requested: 1) the Completion Time provided for Required Action B.2 for ITS LCO 3.6.6 be revised to account for the fact that we are only requiring a shutdown to Mode 3 with pressurizer pressure < 1750 psia, while Required Action B.2 of ISTS LCO 3.6.6A requires a shutdown to Mode 5; and 2) requested the deletion of a reference to a Note 5 in JFD 6 for Section 3.6. To resolve these comments, the following changes were made: 1) the Markups of the Action for CTS 3.6.2.1 were revised to require the plant to be placed in Mode 3 with pressurizer pressure < 1750 psia within 12 hours in the event the Containment Spray System is inoperable and cannot be restored within the specified Completion Time. The proposed change was justified by DOC M.5 for ITS 3.6.6; 2) DOC L.1 for ITS 3.6.6 and its associated NSHC were deleted, because they were no longer used; 3) the ISTS Markup for ITS 3.6.6 was changed to require the plant to be placed in Mode 3 with pressurizer pressure < 1750 psia within 12 hours in the event the Containment Spray System is inoperable and cannot be restored within the

ATTACHMENT (2)

SUMMARY OF CHANGES

specified Completion Time. JFD 6 was revised to provide justification for this proposed deviation; 4) the ISTS Bases Markup for Required Action B.2 for ITS 3.6.6 was revised to be consistent with the revised ITS; and 5) JFD 6 for ITS 3.6.6 was revised to delete the reference to Note 5. In addition, the use of the Note to modify the Modc 3 Applicability was changed to add the modification into the Applicability, consistent with the manner in which this issue is handled in ITS 3.5.2. Justification for Deviation 6 was modified to reflect this change. (Comments 3.6.6-6 and 3.6.6-8)

Additionally, the Applicability for ITS 3.6.6 was revised to be more consistent with the writer's guide. This required changes to the ISTS Markup for ITS 3.6.6 and ISTS Bases Markup for ITS 3.6.6.

20. The NRC requested that a generic editorial change made in the ISTS Bases Markup for ITS 3.6.6 be removed, and they requested justification for deleting the references to the spray additive system in the ISTS Bases Markup for ITS 3.6.6. The generic editorial had replaced the word "reduce" with the word "minimize." The generic editorial change was removed from the ISTS Bases Markup for ITS 3.6.6. The deletion of the references to the spray additive system were annotated with JFD 8 for Bases Section 3.6. (Comment 3.6.6-9 and 3.6.6-10)
21. The NRC requested additional justification for the deletion of CTS 4.6.5.2.a. Discussion of Change L.2 for ITS 3.6.7 has been clarified to better state our justification. While resolving this issue, it was discovered that the ISTS Markup for ITS SR 3.6.7.1 did not refer to the correct CTS SR. Thus, the ISTS Markup for ITS SR 3.6.7.1 was revised to refer to the correct CTS SR. (Comment 3.6.7-2)
22. The NRC requested that justification be provided for deleting a Reviewer's Note in the ISTS Bases Markup for ITS 3.6.7. The proposed deviation referenced JFD 10 to Bases Section 3.6. This JFD did not justify the proposed deviation. Justification for Deviation 9 to Bases Section 3.6 provides the appropriate justification. The ISTS Bases Markup for ITS 3.6.7 was revised to annotate the change with the proper JFD. (Comment 3.6.7-3)
23. The NRC requested additional justification for the deletion of the reference to Regulatory Guide 1.52 from the ISTS Bases Markup for ITS SR 3.6.8.2. This justification has been provided as JFD 15 to Bases Section 3.6. (Comment 3.6.8-1) The NRC also questioned the deletion of a statement from the ISTS Bases Markup for ITS SR 3.6.8.1 regarding the purpose of the surveillance. This statement should not have been deleted. Thus, the statement has been restored to the ISTS Bases Markup for ITS SR 3.6.8.1. (Comment 3.6.8-3)
24. The NRC requested additional justification for the deletion of the statement "separate, independent, and redundant" from the ISTS Bases Markup for ITS LCO 3.6.8. The deletion of this statement was inconsistent with information provided in the Background Section of the ISTS Bases Markup for ITS 3.6.8. The ISTS Bases Markup for ITS 3.6.8 was revised to state that the three trains of the iodine removal system are separate, independent (except for power), and redundant. (Comment 3.6.8-2)
25. The NRC requested justification for moving CTS 3/4.6.5.1 to Section 3.3.10. Discussion of Change A.1 for CTS 3/4.6.5.1 was added to provide the justification. (Comment 3/4.6.5-1)

ATTACHMENT (2)

SUMMARY OF CHANGES

While resolving the aforementioned NRC Comment, it was discovered that the move of CTS 3/4.6.6 to Section 3.7 was also lacking justification. Thus, DOC A.1 for CTS 3/4.6.6 was added to provide the justification.

26. An internal reviewer identified that the Bases for ITS 3.6.2 contained an error regarding the remote position indication for the doors of the personnel air locks. The ISTS Bases for ITS 3.6.2 were corrected to reflect that the personnel air locks are provided with an alarm in the control room that actuates when either door or equalizing valve for a personnel air lock is opened.
27. While resolving comments, it was identified that ACTIONS Note 1 of ISTS LCO 3.6.3 was added to CTS LCO 3.6.4.1 without appropriate justification. To resolve this issue, the following changes were made: 1) the Markups of CTS LCO 3.6.4.1 for ITS 3.6.3 were revised; 2) DOC L.11 for ITS 3.6.3 and its associated NSHC were added to justify the change; and 3) the ISTS Markup for ITS 3.6.3 was revised to provide the appropriate cross-references.
28. The requirements of Unit 1 CTS 4.6.1.2.b and 4.6.1.2.c should have been retained in the Containment Leakage Rate Testing Program. To resolve this issue, the following changes were required: 1) the Markups of Unit 1 CTS 4.6.1.2.b and 4.6.1.2.c for ITS 3.6.1 were revised; 2) DOCs LA.2 and LA.3 for ITS 3.6.1 were eliminated; 3) Markups of Unit 1 CTS 4.6.1.2.b and 4.6.1.2.c were added to the CTS Markups for ITS 5.0; 4) a change to Unit 1 CTS 4.6.1.2.b was justified by DOC A.31 for ITS 5.0; 6) the Markups for CTS 3.6.4.1 and 3.6.1.1 for ITS 3.6.3 were revised; 7) DOC A.7 for ITS 3.6.3 was eliminated; 8) the ISTS Markup for ITS 3.6.3 was revised; 9) JFD 3 for ITS Section 3.6 was modified to reflect that requirements for the containment purge isolation valves would be maintained in the Containment Leakage Rate Testing Program; 10) the ISTS Markups for ITS 5.5.16 were revised; 11) JFD 35 for ITS 5.0 was revised; and 12) the ISTS Markup for ITS SR 3.6.1.1 was revised.
29. While reviewing the LA DOCs for ITS Section 3.6, several issues were identified (i.e., items were proposed to be relocated but should have been retained, items were proposed to be relocated to plant procedures and items proposed to be relocated to the Bases were not included in the Bases). The following changes were required to resolve the issues: 1) the ISTS Bases Markups for ITS 3.6.3 were revised to include information that was deleted from the CTS via LA.3 for ITS 3.6.3; 2) the ISTS Bases Markups for ITS 3.6.6 were revised to include information deleted from the CTS via L A.1 for ITS 3.6.6; and 3) the ISTS Bases Markups for ITS 3.6.7 were revised to include information deleted from the CTS via L A.1 for ITS 3.6.7.

The following issues relate to pending TSTF changes.

30. A plant specific justification was provided (Discussion of Deviation 5 to Bases Section 3.0) to justify addition of the words to Bases LCO 3.0.7. The Bases changes are consistent with pending TSTF-48.
31. A plant specific justification was provided (Discussion of Deviation 4 to Bases Section 3.0) to justify the modification to Bases SR 3.0.2. The Bases changes are consistent with pending TSTF-52.

ATTACHMENT (2)

SUMMARY OF CHANGES

32. The NUREG Markup was modified to delete the reference to TSTF-37 as the justification for deleting NUREG Specification 5.6.7, Emergency Diesel Generator Failures Report. In the original submittal, a plant specific justification for this deletion was provided (Discussion of Deviation 19 to Section 5.0).
33. A plant specific justification was provided (Discussion of Deviation 35 to Section 5.0) to justify the changes to the Containment Leakage Rate Testing Program. The changes had been previously justified based on TSTF-52.
34. A plant specific justification was provided (Discussion of Deviation 34 to Section 5.0) to justify deletion of NUREG Specification 5.2.2.b. The change had been previously justified based on TSTF-121.
35. The title of the Quality Assurance Plan in ITS 5.2.1.a has been changed to Quality Assurance Policy, consistent with Calvert Cliffs nomenclature. Appropriate changes to the CTS Markup, Discussion of Change A.5 to Section 5.0, ISTS Markup, and Discussion of Deviation 26 to Section 5.0 have also been made.

ATTACHMENT (3)

IMPROVED TECHNICAL SPECIFICATIONS, REVISION 7

AMENDMENT REVISION BY CHANGE

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
October 6, 1997

1. The Nuclear Regulatory Commission (NRC) requested additional justification for deviating from a yet to be issued revision of TSTF-52, and a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen dated November 2, 1995. To resolve these comments, the Improved Technical Specification (ITS) was revised to reflect the current licensing basis as approved by the NRC in License Amendment Nos. 219 and 196 for Facility Operating License Nos. DPR-53 and DPR-69, respectively. While resolving these comments, the following were discovered: 1) the Current Technical Specification (CTS) Markup for CTS 4.6.1.2 a for ITS 3.6.1 was not consistent with the issued License Amendments; 2) the acceptance criteria for the leakage rate tests provided in the Improved Standard Technical Specification (ISTS) Bases for ITS Surveillance Requirement (SR) 3.6.1.1 was incorrect; and 3) the Markups for CTS 4.6.1.3.a for ITS 3.6.2 were not consistent with the ISTS Markup for ITS 3.6.2 SR 3.6.2.1. To resolve these issues, the following changes were made: 1) the Markups for CTS 4.6.1.2 and CTS 4.6.1.3.a were revised; 2) Discussion of Change (DOC) A.5 was revised to justify the addition of Notes 1 and 2 of ITS SR 3.6.2.1; 3) the references to TSTF-52 were removed from the ISTS Markups for ITS 3.6.1, 3.6.2, and 3.6.3 and the deviations were justified by new Justification for Deviation (JFD) 11 for ITS 3.6; 4) the references to TSTF-52 were removed from the ISTS Bases Markups for ITS 3.6.1, 3.6.2, and 3.6.3. These deviations were justified by exiting JFDs 6 and 8, and new JFD 17 for Bases Section 3.6; and 5) the ISTS Bases Markup for ITS SR 3.6.1.1 were revised to provide the correct acceptance criteria. (Comments 3.6.1-1 and 3.6.2-1)