involve a significant reduction in a margin of safety?

The impact of the surveillance interval extension request was evaluated for each Technical Specification-related safety function for each of the RPS, ESFAS, PORV, LTOP, Remote Shutdown, PAM, Radiation Monitoring, and Containment Sump Level instruments addressed by this submittal. In all cases, parameters specified in the related accident analysis were determined to be unaffected by the surveillance interval extension, and no accident analyses limits required changes. The Reactor Protective System, Engineered Safety Features Actuation System, Power-Operated Relief Valve, Low Temperature Overpressure Protection, Containment Sump Level, and Radiation Monitoring actuation setpoints will not be changed. Analysis has shown that the remote shutdown and PAM indications will continue to be accurate. The methods for detection of degraded instrument operation have not been changed, and remote shutdown and PAM operator indications will continue to provide adequate accuracy. The methods for detection of degraded instrument operation have not been changed, and remote shutdown and PAM operator indications will continue to provide adequate accuracy.

The proposed change does not affect the operation of the systems involved. The surveillance interval extension will not affect the design of the systems, and methods for detection of degraded instrument operation will continue to identify operation problems between calibrations. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendments request involves no significant hazards consideration.

Local Public Document Room location: Calvert County Library, Prince Frederick, Maryland 20678.

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NRC Project Director: Ledyard B. Marsh.

Baltimore Gas and Electric Company, Docket Nos. 50–317 and 50–318, Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, Calvert County, Maryland

Date of amendments request: June 9, 1995.

Description of amendments request: The proposed amendments revise the Calvert Cliffs Nuclear Power Plant Radiological Effluent Technical Specifications (RETS) consistent with Generic Letter (GL), ''Implementation of Programmatic Controls For Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or the Process Control Program (Generic Letter 89–01),'' dated January 31, 1989, and the Improved Standard Technical Specifications for Combustion Engineering Plants published in NUREG–1432, as modified by Mr. W. T. Russell's letter of October 25, 1993, ''Content of Standard Technical Specifications,'' to the Improved Technical Specification Owners Group Chairpersons. Changes for relocating the procedural details of the current RETS to the Offsite Dose Control Manual (ODCM) has been prepared in accordance with the proposed changes to the Administrative Controls section of the Technical Specifications.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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 operation of the facility in accordance with the proposed amendments:

1. Would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes will provide human factor improvements for the Technical Specifications by relocating existing procedural details of the current Radiological Effluent Technical Specifications to the Offsite Dose Control Manual (ODCM). Procedural details for solid radioactive wastes will be relocated to the Process Control Program. The proposed amendment (1) incorporates programmatic controls in the Administrative Controls section of the Technical Specifications that satisfy the requirements of 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, 10 CFR Part 50, Appendix I, and our current Technical Specifications; (2) relocates the existing procedural details in current specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the Technical Specifications to the ODCM; (3) simplifies the associated reporting requirements; (4) simplifies the administrative controls for changes to the ODCM; and (5) updates the definitions of the ODCM consistent with these changes.

Relocating existing requirements and eliminating requirements which duplicate regulatory requirements provide Technical Specifications which are easier to use. Because existing requirements are relocated to established programs where changes to those programs are controlled by regulatory requirements, there is no reduction in commitment and adequate control is still maintained. Likewise, the elimination of requirements which duplicate regulatory requirements enhances the usability of the Technical Specifications without reducing commitments. The additional improvements being proposed neither add nor delete requirements, but merely clarify and improve the readability and understanding of the Technical Specifications. Since the requirements remain the same, these changes only affect the method of presentation, and as such, would not affect possible initiating events for accidents previously evaluated or any system functional requirement.

Furthermore, no safety-related equipment, safety function, or plant operation will be altered as a result of this proposed change. The changes are unrelated to the initiation and mitigation of accidents and equipment malfunctions addressed in the Updated Final Safety Analysis Report.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Would not create the possibility of a new or different type of accident from any accident previously evaluated.

Transferring the procedural details of radiological effluent monitoring and reporting from the Technical Specifications to the ODCM has no impact on plant operation or safety. No safety-related equipment, safety function, or plant operation will be altered as a result of this proposed change. No changes to plant components or structures are introduced which could create new accidents or malfunctions not previously evaluated.

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

3. Would not involve a significant reduction in a margin of safety.

The margin of safety associated with the affected Technical Specifications is to provide assurance that the releases of radioactive materials during actual or potential releases of liquid or gaseous effluents do not exceed the limits of 10 CFR Part 20. This license amendment request relocates the methodology and parameters used to ensure that the 10 CFR Part 20 limits are maintained, but does not change any of these requirements. Thus, no methodology and parameters for controlling radioactive effluent releases will be changed.

The procedural details of the current Radiological Effluent Technical Specifications will be transferred to the ODCM and replaced with programmatic controls consistent with regulatory requirements, including controls on revisions to the ODCM. Thus, no requirements or controls will be reduced.

The proposed revisions to the reporting requirements for Radiological Effluent Release Report and the revision from the old 10 CFR 20.106 requirements to the new 10 CFR 20.1302 have no impact on plant systems, plant operations or accident precursors. The changes to the effluent