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**CENG**<sub>LLC</sub>

a joint venture of



May 11, 2012

U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

**ATTENTION:** Document Control Desk

**SUBJECT:** **Calvert Cliffs Nuclear Power Plant, Units 1 and 2**  
Renewed Facility Operating License Nos. DPR-53 and DPR-69  
Docket Nos. 50-317 and 50-318  
**Nine Mile Point Nuclear Station, Units 1 and 2**  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
Docket Nos. 50-220 and 50-410  
**R.E. Ginna Nuclear Power Plant**  
Renewed Facility Operating License No. DPR-18  
Docket No. 50-244

Sixty-Day Response to 10 CFR 50.54(f) Request for Information

**REFERENCE:** (a) Letter from E. J. Leeds (NRC) and M. R. Johnson, (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status, dated March 12, 2012, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Reference (a) to all power reactor licensees. The NRC letter requests further information from addressees to support the evaluation of NRC Staff Recommendations 2.1, 2.3, and 9.3 from the Near-Term Task Force review of the accident at the Fukushima Dai-ichi nuclear facility. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests within 90 days.

Reference (a) states that if an addressee cannot meet the requested response date, the addressee must provide a response within 60 days of the date of the letter and describe the alternative course of action that it proposes to take, including the basis of the acceptability of the proposed alternative course of action and estimated completion date. After a careful review of the requested actions and information for

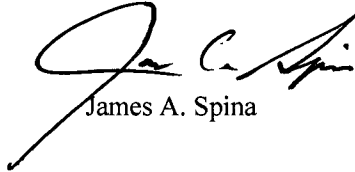
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NRC

Recommendation 9.3 listed in Enclosure 5 to Reference (a), we propose to take the alternative course of action described in Attachment 1 of this letter. The basis for our proposal is explained in Attachment 2. As noted in Attachment 2, the most significant benefit to using the alternative approach is that it will enable us to perform a comprehensive evaluation using industry guidance within a schedule that will have minimal impact on implementing the NRC's new Emergency Preparedness rule.

The schedule in Attachment (1) is a regulatory commitment.

If there are any questions concerning this letter, please contact Chip Perkins at [everett.perkins@cengllc.com](mailto:everett.perkins@cengllc.com) or 410-470-3928.

Sincerely,



James A. Spina

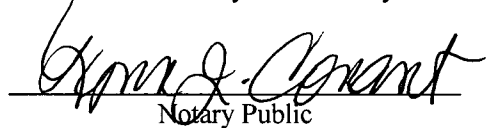
STATE OF MARYLAND :  
: TO WIT:  
CITY OF BALTIMORE :

I, James A Spina, state that I am the Vice President, Corporate Site Operations of Constellation Energy Nuclear Group, LLC and that I am duly authorized to execute and file this document on behalf of this company and its subsidiaries Calvert Cliffs Nuclear Power Plant, LLC, Nine Mile Point Nuclear Station, LLC, and R.E. Ginna Nuclear Power Plant, LLC. To the best of my knowledge and belief, the statements contained in this document with respect to these companies are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by employees and/or consultants of the companies. 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 City of Baltimore, this 11th day of May, 2012.

WITNESS my Hand and Notarial Seal:



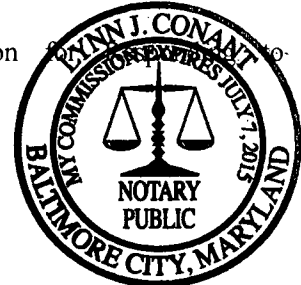
Notary Public

My Commission Expires:

7/7/15  
Date

JAS/EMT/bjd

- Attachments: (1) Proposed Alternative Course of Action for Responding to Recommendation 9.3 Information Request  
(2) Basis for Proposed Alternative Course of Action Recommendation 9.3 Information Request



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May 11, 2012

Page 3

cc: B. K. Vaidya, NRC  
M. C. Thadani, NRC  
N. S. Morgan, NRC  
W. M. Dean, NRC  
Resident Inspector, Calvert Cliffs

Resident Inspector, Ginna  
Resident Inspector, Nine Mile Point  
S. Gray, DNR

**ATTACHMENT (1)**

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**PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING  
TO RECOMMENDATION 9.3 INFORMATION REQUEST**

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**ATTACHMENT 1  
PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO  
RECOMMENDATION 9.3 INFORMATION REQUEST**

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**COMMUNICATIONS**

Request Number	Estimated Completion Date	Requested Information
1	10/31/12	<p><i>Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described in Enclosure 5 to the NRC's March 12, 2012 Request for Information. The assessment should:</i></p> <ul style="list-style-type: none"> <li>• <i>Identify any planned or potential improvements to existing <u>onsite</u> communications systems and their required normal and/or backup power supplies,</i></li> <li>• <i>Identify any planned or potential improvements to existing <u>offsite</u> communications systems and their required normal and/or backup power supplies,</i></li> <li>• <i>Provide a description of any new communications system(s) or technologies that will be deployed based upon the assumed conditions described above, and</i></li> <li>• <i>Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all AC power.</i></li> </ul>
2	6/11/12	<i>Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.</i>
3	9/28/12 10/31/12	<p><i>Provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.</i></p> <ul style="list-style-type: none"> <li>• Conduct the communications assessment.</li> <li>• Provide a schedule of the time needed to implement the results of the communications assessment.</li> </ul>

**ATTACHMENT 1  
PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO  
RECOMMENDATION 9.3 INFORMATION REQUEST**

**STAFFING**

<b>Request Number</b>	<b>Estimated Completion Date</b>	<b>Requested Information</b>
1	<p data-bbox="354 1108 521 1234">4/30/2013 Calvert Cliffs and Nine Mile Point</p> <p data-bbox="354 1331 516 1423">Ginna* Calvert Cliffs*</p> <p data-bbox="363 1457 505 1520">Nine Mile* Point Unit 1</p> <p data-bbox="363 1549 505 1612">Nine Mile* Point Unit 2</p>	<p data-bbox="548 436 1403 655"><i>Provide an assessment of the onsite and augmented staff needed to respond to a large scale natural event meeting the conditions described in Enclosure 5 to the NRC's March 12, 2012 Request for Information. This assessment should include a discussion of the onsite and augmented staff available to implement the strategies as discussed in the emergency plan and/or described in plant operating procedures. The following functions are requested to be assessed:</i></p> <ul style="list-style-type: none"> <li data-bbox="548 672 1403 953">• <i>How onsite staff will move back-up equipment (e.g., pumps, generators) from alternate onsite storage facilities to repair locations at each reactor as described in the order regarding the NRC Near-Term Task Force (NTTF) Recommendation 4.2. It is requested that consideration be given to the major functional areas of NUREG-0654, Table B-1, such as plant operations and assessment of operational aspects, emergency direction and control, notification/communication, radiological accident assessment, and support of operational accident assessment, as appropriate.</i></li> <li data-bbox="548 970 1273 999">• <i>New staff or functions identified as a result of the assessment.</i></li> <li data-bbox="548 1016 1403 1079">• <i>Collateral duties (personnel not being prevented from timely performance of their assigned functions).</i></li> </ul> <p data-bbox="548 1108 1403 1201">Provide onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment]</p> <p data-bbox="548 1331 1403 1394">Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment]</p> <p data-bbox="548 1423 1208 1638">* 4 months prior to beginning of second refueling outage: Ginna – G1R39 Calvert Cliffs – 2RFO1 Nine Mile Point Unit 1 – N1R23 Nine Mile Point Unit 2 – N2R15</p>

**ATTACHMENT 1  
PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO  
RECOMMENDATION 9.3 INFORMATION REQUEST**

Request Number	Estimated Completion Date	Requested Information
2	<p>3/29/13 Calvert Cliffs and Nine Mile Point</p> <p>Ginna* Calvert Cliffs*</p> <p>Nine Mile* Point Unit 1</p> <p>Nine Mile* Point Unit 2</p>	<p><i>Provide an implementation schedule of the time needed to conduct the onsite and augmented staffing assessment. If any modifications are determined to be appropriate, please include in the schedule the time to implement the changes.</i></p> <p>1. Conduct the onsite and augmented staffing assessment:</p> <p>The onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment]</p> <p>The onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment]</p> <p>* 4 months prior to beginning of second refueling outage: Ginna – G1R39 Calvert Cliffs – 2RFO21 Nine Mile Point Unit 1 – N1R23 Nine Mile Point Unit 2 – N2R15</p>
	<p>4/30/13 Calvert Cliffs and Nine Mile Point</p> <p>Ginna* Calvert Cliffs*</p> <p>Nine Mile* Point Unit 1</p> <p>Nine Mile* Point Unit 2</p>	<p>2. A schedule of the time needed to implement changes will be provided:</p> <ul style="list-style-type: none"> <li>• Those associated with the Phase 1 staffing assessment.</li> <li>• Those associated with the Phase 2 staffing assessment.</li> </ul> <p>* 4 months prior to beginning of second refueling outage: Ginna – G1R39 Calvert Cliffs – 2RFO21 Nine Mile Point Unit 1 – N1R23 Nine Mile Point Unit 2 – N2R15</p>

**ATTACHMENT 1  
PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO  
RECOMMENDATION 9.3 INFORMATION REQUEST**

<b>Request Number</b>	<b>Estimated Completion Date</b>	<b>Requested Information</b>
3	6/11/12	<i>Identify how the augmented staff would be notified given degraded communications capabilities.</i>
4	6/11/12	<i>Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.</i>
5	6/11/12	<i>Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.</i>
6	<p data-bbox="355 789 521 911">4/30/13 Calvert Cliffs and Nine Mile Point</p> <p data-bbox="347 1037 518 1268">Ginna* Calvert Cliffs* Nine Mile* Point Unit 1 Nine Mile* Point Unit 2</p>	<p data-bbox="550 600 1403 756"><i>Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.).</i></p> <ul style="list-style-type: none"> <li data-bbox="550 789 1203 821">• Those associated with the Phase 1 staffing assessment.</li> <li data-bbox="550 1037 1203 1068">• Those associated with the Phase 2 staffing assessment.</li> </ul> <p data-bbox="550 1100 1211 1318">* 4 months prior to beginning of second refueling outage: Ginna – G1R39 Calvert Cliffs – 2RFO21 Nine Mile Point Unit 1 – N1R23 Nine Mile Point Unit 2 – N2R15</p>



**ATTACHMENT (2)**

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**BASIS FOR PROPOSED ALTERNATIVE COURSE OF ACTION FOR  
RESPONDING TO RECOMMENDATION 9.3 INFORMATION REQUEST**

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**ATTACHMENT 2**  
**BASIS FOR PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO**  
**RECOMMENDATION 9.3 INFORMATION REQUEST**

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**Communications**

There are two separate responses to the information requests related to communications. The alternative timing of responses to Requests 1 and 3 proposed in this letter reflects the higher priority placed by the NRC staff, and approved by the Commission in SRM-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final Rule on Enhancements to Emergency Preparedness Regulations (EP Rule) issued on November 23, 2011 (76 Federal Register 72560). The proposed alternative timing is warranted as many of the Constellation Energy Nuclear Group (CENG) staff resources necessary for performing the communications assessment are the same resources involved in implementing new EP Rule requirements, responding to Institute of Nuclear Power Operations initiatives related to enhancing communications capabilities (e.g., IER L1-11-4), and maintaining existing emergency preparedness communications equipment.

In addition, the estimated completion date assigned to Request 3 will promote alignment between the out-year budgeting and funding of future enhancements, and the development of an accurate and complete enhancement implementation schedule.

**Staffing**

As presented in Attachment 1, a 2-phase approach will be used to respond to the information requests associated with staffing.

<b>Plant Type</b>	<b>Phase 1 Staffing Assessment</b> (for functions except those related to NTTF Recommendation 4.2)	<b>Phase 2 Staffing Assessment</b> (for functions related to NTTF Recommendation 4.2)
R.E. Ginna Nuclear Power Plant	Perform staffing assessment and implement actions as required by recent EP Rule using Interim Staff Guidance (ISG) and NEI 10-05	Perform staffing assessment as requested using NEI 12-01; provide results as described in Attachment 1
Nine Mile Point Nuclear Station and Calvert Cliffs Nuclear Power Plant	Perform staffing assessment and implement actions as required by recent EP Rule using ISG and NEI 10-05  Perform staffing assessment as requested using NEI 12-01 and material from NEI 10-05; provide results as described in Attachment 1.	Perform staffing assessment as requested using NEI 12-01; provide results as described in Attachment 1

**ATTACHMENT 2**  
**BASIS FOR PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO**  
**RECOMMENDATION 9.3 INFORMATION REQUEST**

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**Staffing Basis**

Phase 1

For Nine Mile Point Nuclear Station (Nine Mile Point) and Calvert Cliffs Nuclear Power Plant (Calvert Cliffs), the Phase 1 staffing assessment will be performed by March 29, 2013, and provided by April 30, 2013. This assessment will consider all requested functions except those related to Near-Term Task Force (NTTF) Recommendation 4.2. An assessment considering these functions will be performed in Phase 2.

The timing of the Phase 1 staffing assessment reflects the higher priority placed by the staff, and approved by the Commission in SRM-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final EP Rule issued on November 23, 2011 (76 Fed. Reg. 72,560). In particular, Section IV.A.9 of 10 CFR 50, Appendix E, requires that licensees complete a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan. As stated in the EP Rule, this analysis must be completed by December 24, 2012.

Following completion of the EP Rule staffing analysis, the staffing assessment associated with the NRC 50.54(f) letter will be performed. Based on staffing analysis experience to date, it is anticipated that a multi-unit staffing analysis will require approximately three months to complete and validate. One additional month is allotted for processing of an assessment submittal package.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 1 staffing assessment.

Single-unit plants such as R.E. Ginna Nuclear Power Plant (Ginna) do not need to provide a Phase 1 staffing assessment in response to the 50.54(f) letter as performance of this activity is governed by the EP Rule and existing license requirements.

Phase 2

The Phase 2 staffing assessment will be performed by Ginna, Calvert Cliffs and Nine Mile Point and provided according to the schedule stated in Attachment 1. This assessment will consider the requested functions related to NTTF Recommendation 4.2.

The industry will be responding to multiple regulatory actions resulting from the recommendations contained in the NTTF report, as modified in related Commission Papers and Staff Requirements Memoranda. One of these actions, in particular, has the potential to impact emergency response staffing levels. This action is associated with NTTF Recommendation 4.2 and was subsequently issued as NRC Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, EA-12-049.

In summary, Order EA-12-049 requires a three-phase approach for mitigating beyond-design-basis external events. The initial phase requires the use of installed equipment and resources to maintain or restore core cooling, containment and spent fuel pool cooling. The transition phase requires providing sufficient, portable, onsite equipment and consumables to maintain or restore these functions until they can be accomplished with resources brought from off site. The final phase requires obtaining sufficient offsite resources to sustain those functions indefinitely.

**ATTACHMENT 2**  
**BASIS FOR PROPOSED ALTERNATIVE COURSE OF ACTION FOR RESPONDING TO**  
**RECOMMENDATION 9.3 INFORMATION REQUEST**

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Additional details on an acceptable approach for complying with this Order will be contained in a final ISG scheduled to be issued by the NRC in August 2012.

In response to the Order, each licensee must develop new strategies for mitigating beyond-design-basis external events. To ensure accurate results, the staffing assessment for response functions related to NTF Recommendation 4.2 must be based on the actions delineated in procedures and guidelines developed in response to the Order. Once the site-specific actions associated with the new response strategies are defined (e.g., down to the procedure or guideline step level), the staffing needed to perform these actions can be assessed with the necessary level of accuracy.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 2 staffing assessment.

The Phase 2 staffing assessment is one component of the overall work plan necessary to implement the requirements of the Order. Ginna, Nine Mile Point and Calvert Cliffs, as stated in the Order, "...shall complete full implementation no later than two (2) refueling cycles after submittal of the overall integrated plan, as required in Condition C.1.a, or December 31, 2016, whichever comes first." "Full compliance shall include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies."

Schedule for Ginna

Based on a review of the planned actions necessary to comply with the Order, an assessment of the staffing for the functions related to NTF Recommendation 4.2 will be provided by 4 months prior to beginning of the second refueling outage (as used within the context of NRC Order EA-12-049).

Schedule for Calvert Cliffs

Based on a review of the planned actions necessary to comply with the Order, an assessment of the staffing for the functions related to NTF Recommendation 4.2 will be provided by 4 months prior to the first occurrence of a second refueling outage at the site (i.e., the first "second refueling outage") as used within the context of NRC Order EA-12-049.

Schedule for Nine Mile Point

Based on a review of the planned actions necessary to comply with the Order, an assessment of the staffing for the functions related to NTF Recommendation 4.2 will be provided by 4 months prior to beginning of the second refueling outage (as used within the context of NRC Order EA-12-049). Nine Mile Point will provide two Phase 2 staffing assessments. Each assessment will be provided 4 months prior to the occurrence of the second refueling outage of the unit to which the assessment is applicable.