

# CENG

a joint venture of



June 8, 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

Ninety-Day Response to Recommendation 9.3 of 10 CFR 50.54(f) Request for Information

**REFERENCES:**

- (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
- (b) Letter from J. A. Spina (CENG) to Document Control Desk (NRC), dated May 11, 2012, Sixty-Day Response to 10 CFR 50.54(f) Request for Information

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Reference (a). Enclosure 5 of the letter contains specific requested actions and requested information associated with Recommendation 9.3 for Emergency Preparedness programs. 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.

A001  
WRP


In accordance with Reference (a), we submitted Reference (b), which proposed an alternative schedule for performing the requested actions. As described in our alternative schedule, the responses to the following information requests in Enclosure 5 of Reference (a) are presented in Attachments 1-3.

- Communications Request #2
- Staffing Request #3
- Staffing Request #4
- Staffing Request #5

There are no regulatory commitments contained in this letter.

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

Sincerely,



Samuel L. Belcher

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

I, Samuel L. Belcher, state that I am Senior Vice President – Site Operations of Constellation Energy Nuclear Group, LLC and that I am duly authorized to execute and file this response 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 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.

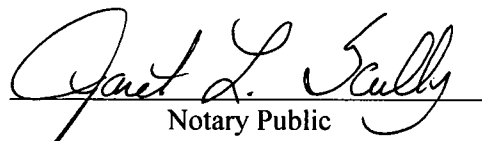



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Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of St. Mary's, this 8th day of June, 2012.

WITNESS my Hand and Notarial Seal:

My Commission Expires:



Notary Public

March 14, 2015  
Date

SLB/EMT/bjd

Document Control Desk

June 8, 2012

Page 3

- Attachments:
- (1) R.E. Ginna Nuclear Power Plant, LLC, 90-Day Response to NRC 50.54(f) Request for Information
  - (2) Calvert Cliffs Nuclear Power Plant, LLC, 90-Day Response to NRC 50.54(f) Request for Information
  - (3) Nine Mile Point Nuclear Station, LLC, 90-Day Response to NRC 50.54(f) Request for Information

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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**R.E. GINNA NUCLEAR POWER PLANT, LLC, 90-DAY RESPONSE TO  
NRC 50.54(f) REQUEST FOR INFORMATION**

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**ATTACHMENT (1)**  
**R.E. GINNA NUCLEAR POWER PLANT, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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This is the R.E. Ginna Nuclear Power Plant, LLC (Ginna) ninety-day response to the Nuclear Regulatory Commission request for information regarding Recommendation 9.3 of the Near-Term Task Force Review of insights from the Fukushima Dai-ichi accident.

**Communications**

*Request #2 - Addressees are requested to 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.*

**Actions Taken**

**A. Power Supplies**

**Generators**

1. Ginna purchased six small backup generators for powering up and charging portable satellite phone batteries and radio battery chargers.
  - Operating unit 2
  - Technical Support Center (TSC) 1
  - Operational Support Center (OSC) 1
  - Emergency Offsite Facility (EOF) 1
  - Joint Information Center (JIC) 1
2. When put in service, these additional backup generators will enhance the satellite telephone and radio communications systems by providing power in the event of a loss of off-site and/or on-site AC power.

**Actions Planned**

There are no further actions planned at Ginna to enhance power supplies of existing communications systems prior to completion of the communications systems and equipment assessment related to Recommendation 9.3.

**Staffing**

*Request #3 - Identify how the augmented staff would be notified given degraded communications capabilities.*

Ginna site procedure IP-EPP-5, Emergency Response Organization Expectations and Responsibilities, Section 5.2 E, provides the following direction: "All ERO Responders are expected to report to their designated Emergency Response Facility after the occurrence of a natural or man-made disaster that may adversely affect communications on a wide spread basis (i.e., earthquake, regional black-out or technological event)."

This expectation has been communicated to the Emergency Response Organization (ERO) via site-wide communications, and is reinforced in Basic Emergency Response Training computer-based training taken annually by all ERO members.

**ATTACHMENT (1)**  
**R.E. GINNA NUCLEAR POWER PLANT, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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EPIP-1-5, Notifications, provides detailed instructions on how to activate the Emergency Response Notification System (ERONS) including back-up methods should the primary method become unavailable.

ER-COMM.1, Loss of Communications, provides guidance to respond to loss of the designated communications for offsite notifications.

*Request #4 - 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.*

The following methods of access are available to the Ginna site. One or more of these methods is expected to be available after a widespread large-scale natural event:

A. Types of Transport

1. Airlift

- Ginna site parking lots
- Several large, level, open fields at the Ginna site

2. Water

- There are no docks on site for boat access.

3. Roadways

- Lake Road east and west to site access roads
  - 3 access roads
- Ontario Center Road from south to site access road
  - 1 access road

Ginna has one alternate offsite emergency response facility assembly/staffing location (Ginna EOF, 1255 Research Forest, Macedon, NY) that may be used as assembly point for transporting ERO personnel to the site.

B. Transport providers for the above types of transport available to Ginna include:

1. Airlift:

- New York State Police
- Monroe County Sheriff
- Aviation Services Unlimited
- JBI Helicopters

2. Roadways:

- Personal vehicles

**ATTACHMENT (1)**  
**R.E. GINNA NUCLEAR POWER PLANT, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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C. Provisions for restoring site access at Ginna include:

1. The Wayne County Highway Superintendent will coordinate with the New York State Department of Transportation and maintain evacuation routes free of impediments. The activities involved may include: debris clearance; emergency repairs to roads and bridges; maintaining essential plant services; and assistance, when needed, with the removal of any road impediments. The evacuation routes include all major roadways leading up to Ginna.
2. In addition, Ginna site procedures ER-SC.1, Adverse Weather Plan, Section 6.0 and EPIP-1-17, Planning for Adverse Weather, Section 5.0 provides direction for personnel to prepare the site for various natural events including: High Winds, Severe Storms, Hurricanes, Heavy Snow, and Ice. These preparations include actions to ensure the availability of access roads and to stage ERO personnel at their facilities in advance of a predicted severe weather event.

D. The following agreement with Ginna is in place:

Wayne County Radiological Emergency Preparedness (REP) Plan, Part III, Procedure 5, Highway Departments, states in part that Wayne County Superintendent of Highways will coordinate with the NY State Department of Transportation and maintain evacuation routes free of impediments. The evacuation routes include roadways leading up to Ginna Station. The response actions are stated throughout the Wayne County REP Plan for each Emergency Classification level of an Alert or higher.

*Request #5 - Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.*

No further actions have been taken or are planned at Ginna prior to the completion of the staffing assessment.

**ATTACHMENT (2)**

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**CALVERT CLIFFS NUCLEAR POWER PLANT, LLC, 90-DAY  
RESPONSE TO NRC 50.54(f) REQUEST FOR INFORMATION**

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**ATTACHMENT (2)**  
**CALVERT CLIFFS NUCLEAR POWER PLANT, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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This is the Calvert Cliffs Nuclear Power Plant (CCNPP) ninety-day response to the Nuclear Regulatory Commission request for information regarding Recommendation 9.3 of the Near-Term Task Force Review of insights from the Fukushima Dai-ichi accident.

**Communications**

*Request #2 - Addressees are requested to 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.*

**Actions Taken**

**A. Power Supplies**

**Generators**

1. Calvert Cliffs Nuclear Power Plant purchased four small backup generators for powering up and charging portable satellite phone batteries and radio battery chargers.
  - Control Room/Technical Support Center (TSC) 1
  - Operational Support Center (OSC) 1
  - Emergency Offsite Facility (EOF) 1
  - Joint Information Center (JIC) 1
2. When put in service, these additional backup generators will enhance the satellite telephone and radio communications systems by providing power in the event of a loss of off-site and/or on-site AC power.

**Actions Planned**

There are no further actions planned at CCNPP to enhance power supplies of communications systems prior to completion of the communications systems and equipment assessment related to Recommendation 9.3

**Staffing**

*Request #3 - Identify how the augmented staff would be notified given degraded communications capabilities.*

Site procedure EP-1-107, Emergency Response Organization Expectations and Responsibilities, Section 5.2.E.2 provides the following direction: “In the event of a regional blackout that causes an extended loss of communications capabilities, the Regulated/Required ERO positions for the duty team are expected to report to their ERFs as a precaution, as safe travel conditions allow.”

This expectation has been communicated to the Emergency Response Organization (ERO) via site-wide communications, and is reinforced in Basic Emergency Response Training taken annually by all ERO members.

ERPIP-901, Communications Equipment, provides detailed instructions to the ERO population on the various communications means available to them in the event their primary method is unavailable.

ERPIP-105, Control Room Communicator, provides detailed instructions on how to activate the ERONS system, including back-up methods.

**ATTACHMENT (2)**  
**CALVERT CLIFFS NUCLEAR POWER PLANT, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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Request #4 - *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.*

The following methods of access are available to the CCNPP site. One or more of these methods are expected to be available after a widespread large scale natural event:

A. Types of Transport

1. Airlift

- CCNPP Visitor Center Field (Primary)
- Emergency Operations Facility (Alternate)
- Lower Laydown Area (Alternate)
- Old Bay Farm Field (Alternate)
- CCNPP site parking lots
- Several large, level, open fields at the CCNPP site

2. Water

- Boats via the Chesapeake Bay to the CCNPP barge dock.

3. Roadways

- Maryland State Highway Route 2-4 North and South to site access roads
  - 1 primary (Calvert Cliffs Parkway)
  - 2 alternate access roads (Contractor and Camp Conoy).
- 500kV right of way inspection road south from Calvert Beach Road in Saint Leonard to Calvert Cliffs Parkway

Calvert Cliffs Nuclear Power Plant has four alternate offsite ERO assembly/staffing or staging areas that may be used as assembly points for transporting ERO personnel to the site. Those areas are: Saint Leonard Volunteer Fire Department (Primary), Solomons Volunteer Fire Department (Primary), MD Route 2-4 closed and controlled by local law enforcement (Alternate), and Flag Ponds Access Road (Alternate).

**ATTACHMENT (2)**  
**CALVERT CLIFFS NUCLEAR POWER PLANT, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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**B. Transport providers for the above types of transport available to CCNPP include:**

1. Airlift
  - Maryland National Guard
  - Aberdeen Proving Ground
  - Maryland State Police
  - Atlantic Rotors Inc., St. Mary's County Airport
2. Water
  - Chesapeake Energy Services
3. Roadways
  - Personal vehicles

**C. Provisions for restoring site access at CCNPP include:**

1. Calvert and St. Mary's Counties will coordinate with the Maryland State Highway Administration to ensure traffic impediments are removed to ensure restore traffic flow for evacuation and/or return. The activities involved may include: debris clearance; emergency repairs to roads and bridges; maintaining essential plant services; and assistance, when needed, with the removal of any road impediments. The evacuation route includes Maryland State Highway Route 2/4.
2. Site procedure EP-1-108, Severe Weather Preparation, provides direction for personnel to prepare the site for various natural events including: High Winds, Severe Storms, Hurricanes, Heavy Snow, and Ice. These preparations include actions to ensure the availability of access roads and to stage ERO personnel at their facilities in advance of a predicted severe weather event.

**D. The following agreements with CCNPP are in place:**

1. Calvert County Radiological Emergency Planning (REP) Procedure, Attachment 10, Department of Public Works Standard Operating Guidelines; states in part, "In the event of seasonal, or other causes of traffic impediments, the Department of Public Works in cooperation with State Highway Administration (SHA) will provide necessary equipment, vehicles and personnel to restore traffic flow for evacuation and/or return." The evacuation route includes Maryland State Highway Route 2/4.
2. St. Mary's County Radiological Emergency Planning (REP) Procedure, Attachment 2, Department of Public Safety, states in part that "Insure that evacuation routes are passable through evaluation of current road conditions and any potential impediments (snow, ice, flooding, constructions, and bridges) and coordinate actions of key support agencies." The evacuation route includes Maryland State Highway Route 2/4

*Request #5 - Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.*

No further actions have been taken or are planned at CCNPP prior to the completion of the staffing assessment.

**ATTACHMENT (3)**

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**NINE MILE POINT NUCLEAR STATION, LLC, 90-DAY RESPONSE TO  
NRC 50.54(f) REQUEST FOR INFORMATION**

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**ATTACHMENT (3)**  
**NINE MILE POINT NUCLEAR STATION, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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This is the Nine Mile Point Nuclear Station, LLC (NMPNS) ninety-day response to the Nuclear Regulatory Commission request for information regarding Recommendation 9.3 of the Near-Term Task Force Review of insights from the Fukushima Dai-ichi accident.

**Communications**

*Request #2 - Addressees are requested to 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.*

**Actions Taken**

**A. Power Supplies**

**Generators**

1. Nine Mile Point Nuclear Station purchased six small backup generators for powering up and charging portable satellite phone batteries and radio battery chargers.
  - One generator for each operating unit 2
  - Technical Support Center (TSC)/  
Operational Support Center (OSC) 1
  - Emergency Operations Facility (EOF)/  
Joint Information Center (JIC) 1
  - One generator for each unit's leaky wire  
antenna system and radio repeaters 2
2. When put in service, these additional backup generators will enhance the satellite telephone and radio communications systems by providing power in the event of a loss of off-site and/or on-site AC power.

**Actions Planned**

There are no further actions planned at NMPNS to enhance power supplies of existing communications systems prior to completion of the communications systems and equipment assessment related to Recommendation 9.3.

**Staffing**

*Request #3 - Identify how the augmented staff would be notified given degraded communications capabilities.*

Site procedure NIP-EPP-01, Emergency Response Organization Expectations and Responsibilities, Section 5.4.A, provides the following direction: "ERO members are expected to report to their designated emergency response facility after the occurrence of a natural disaster or man-made disaster that may affect communications on a wide spread basis (earthquake, regional black-out or technological event)."

This expectation has been communicated to the Emergency Response Organization (ERO) via site-wide communications, and is reinforced in Basic Emergency Response Training taken annually by all ERO members.

**ATTACHMENT (3)**  
**NINE MILE POINT NUCLEAR STATION, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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EPIP-EPP-17, Emergency Communications Procedure, provides detailed alternative communication methods in the event the primary methods are unavailable.

EPIP-EPP-20, Emergency Notification Procedure, provides detailed instructions on how to activate the Emergency Response Notification System (ERONS) including back-up methods should the primary method become unavailable.

*Request #4 - 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.*

The following methods of access are available to the NMPNS site. One or more of these methods are expected to be available after a widespread large scale natural event:

A. Types of Transport

1. Airlift

- A dedicated helicopter landing pad location on site, adjacent to the Main Security Access road.
- Nine Mile Point site parking lots
- Field at the Nuclear Learning Center
- Field near Nine Mile Point weather tower west
- Field southeast of Unit 2

2. Water

There is a barge dock located on the east side of James A. FitzPatrick Nuclear Power Plant, which is adjacent to NMPNS.

3. Roadways

- Highway access to the site is via two county roads, Route 1A to the southwest and Route 29 to the east. A private east-west road crosses the site and connects these two county roads.
- A power line right-of-way inspection road entering south from the site also provides access.

Nine Mile Point Nuclear Station has two alternate ERO assembly/staffing locations that may be used as assembly points for transporting ERO personnel to the site. The Emergency Operations Facility and the Joint Information Center are located approximately 12 miles from the reactor site on County Route 176 near the Oswego County Airport. The National Grid Service Center on Howard Road in Volney, New York is a designated off-site assembly area.

**ATTACHMENT (3)**  
**NINE MILE POINT NUCLEAR STATION, LLC, 90-DAY RESPONSE TO NRC 50.54(f)**  
**REQUEST FOR INFORMATION**

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B. Transport providers for the above types of transport available to NMPNS include:

1. Airlift
  - Executive Fliteways, Inc
  - New York State Police
  - Onondaga County.
2. Roadways
  - Personal Vehicles

C. Provisions for restoring site access at NMPNS include:

1. The Oswego County Highway Superintendent will coordinate with the New York State Department of Transportation and maintain evacuation routes free of impediments. The activities involved may include: debris clearance; emergency repairs to roads and bridges; maintaining essential plant services; and assistance, when needed, with the removal of any road impediments. The evacuation routes include all major roadways leading up to NMPNS.
2. In addition, site procedure EPIP-EPP-26, "Natural Hazard Preparation and Recovery" Section 3.3, Preventive and Mitigating Actions, and Attachment 1, Preparation and Response to Natural Hazards, provide direction for personnel to prepare the site for various natural events including: High Winds, Severe Storms, Hurricanes, Heavy Snow, and Ice. These preparations include actions to ensure the availability of access roads and to stage ERO personnel at their facilities in advance of a predicted severe weather event.

D. The following agreements with NMPNS are in place:

1. Oswego County Radiological Emergency Planning (REP) Procedure, Section G, Highway Department; states in part that the Oswego County Highway Superintendent will coordinate with the New York State Department of Transportation and maintain evacuation routes free of impediments. The evacuation routes include all major roadways leading up to Nine Mile Point. The response actions are stated throughout the Oswego County REP plan for each emergency classification level of an Alert or higher.
2. A mutual aid agreement exists between NMPNS and James A. FitzPatrick Nuclear Power Plant.

*Request #5 - Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.*

No further actions have been taken or are planned at NMPNS prior to the completion of the staffing assessment.