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a joint venture of

October 26, 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	
	Initial Status Report in Response to Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)	
REFERENCES:	(a) NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012	
	(b) NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012	
	(c) Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012	
	(1) NET 12.07 \mathbf{D}^{\prime} and \mathbf{E} [11] \mathbf{O} [12] \mathbf{O} [12] \mathbf{D}	

(d) NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

On March 12, 2012, the Nuclear Regulatory Commission issued Reference (a) to power reactor licensees. Reference (a) was immediately effective and directs licensees to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference (a).

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Reference (a) requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference b) was issued August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference (a) within 60 days following issuance of Reference (b). This report confirms the above licensees have received Reference (b) and are in process of evaluating the guidance for the purpose of establishing mitigation strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event of a beyond-design-basis external event as described in Attachment 2 of Reference (a).

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference (b), as described in Reference (c).
- Site-specific evaluations are in progress to establish the coping capabilities as defined in Reference (d).
- Resources have been identified and project plans initiated, including development of milestones, to assure compliance with Reference (a).

Planned activities for the next six months:

• Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the February 28, 2013, submittal:

• None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be part of the overall integrated plan.
- Implementation of the order is scheduled to be completed for Nine Mile Point Nuclear Station Unit 1 prior to startup from the Spring 2015 refueling outage.
- Implementation of the order is scheduled to be completed for Nine Mile Point Nuclear Station Unit 2 prior to startup from the Spring 2016 refueling outage.
- Implementation of the order is scheduled to be completed for Calvert Cliffs Nuclear Power Plant Unit 1 prior to startup from the Spring 2016 refueling outage.
- Implementation of the order is scheduled to be completed for Calvert Cliffs Nuclear Power Plant Unit 2 prior to startup from the Spring 2015 refueling outage.
- Implementation of the order is scheduled to be completed for R.E. Ginna Nuclear Power Plant prior to startup from the Fall 2015 refueling outage.

This letter contains no regulatory commitments.

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

> Sincerely, Konnick

STATE OF MARYLAND

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CITY OF BALTIMORE

MARY G. KORSNICK

, state that I am the $\ CNO$ I, 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.

	Mary L. Korsnick
Subscribed and sworn before me, a Notary Public in this 2012 day of, 2012.	
WITNESS my Hand and Notarial Seal:	Notary Public
My Commission Expires:	0/0/15

Date

E. E. Bowman, NRC Resident Inspector, Calvert Cliffs Resident Inspector, Ginna Resident Inspector, Nine Mile Point S. Gray, DNR

/EMT/bjd

E. J. Leeds, NRC cc: B. K. Vaidva, NRC M. C. Thadani, NRC N. S. Morgan, NRC W. M. Dean, NRC J. A. Kratchman, NRC