



April 26, 2013

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

Response to Request for Information: Near-Term Task Force Recommendation
2.1, Seismic Reevaluation

- 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, ML12073A348
 - (b) Letter from M. D. Flaherty (CENG) to Document Control Desk (NRC), dated June 25, 2012, Revised Response to Seismic Recommendation 2.1 of 10 CFR 50.54(f) Request for Information, ML12180A121
 - (c) Letter from D. L. Skeen (NRC) to J. E. Pollock (NEI), dated February 15, 2013, Endorsement of Electric Power Research Institute Final Draft Report 1025287, "Seismic Evaluation Guidance," ML12319A074
 - (d) EPRI Technical Report 1025287, "Seismic Evaluation Guidance: Screening, Prioritization and Implementation Details (SPID) for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic," dated November 2012, ML12333A170
 - (e) Federal Register, Volume 78, Number 38, Pages 13097 through 13099, dated February 26, 2013 [FR Doc No. 2013-04396]
 - (f) Letter from A. R. Pietrangelo (NEI) to D. L. Skeen (NRC), Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations, dated April 9, 2013, ML13101A254

- (g) Letter from M. A. Mitchell (NRC) to K. A. Keithline (NEI), Response to Nuclear Energy Institute Request for Review of Draft Electric Power Research Institute Report, "Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic," dated March 20, 2013, ML 13078A029
- (h) Letter from M. A. Mitchell (NRC) to K. A. Keithline (NEI), Correction to Title of Response Letter to Nuclear Energy Institute Concerning Central and Eastern United States Ground Motion Model Update Project, dated March 22, 2013, ML13021A079
- (i) NRC Japan Lessons-Learned Project Directorate, JLD-ISG-2012-004, Guidance on Performing a Seismic Margin Assessment in Response to the March 2012 Request for Information Letter, dated November 16, 2012, ML12286A029

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference (a) to request information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for seismic hazard reevaluation. In accordance with Enclosure 1 of Reference (a), each licensee is required to submit to the NRC its intention to follow the NRC-endorsed seismic reevaluation guidance, or an alternative approach, including acceptance criteria, 60 days after the issuance of the NRC-endorsed guidance. On June 25, 2012, Constellation Energy Nuclear Group (CENG) submitted a 90-day response to NTTF Recommendation 2.1 of the 10 CFR 50.54(f) Request for Information (Reference (b)). The letter contained a regulatory commitment to comply with Required Response 1 of Enclosure 1 of Reference (a) within 60 days of the NRC endorsement of the Screening, Prioritization and Implementation guidance. For the purpose of meeting the deadline established in Enclosure 1 of Reference (a) and the regulatory commitment in Reference (b), Reference (c) defined that the 60-day response period commences on the date the NRC endorsement of the Screening, Prioritization and Implementation Details (SPID) report is published in the Federal Register. The NRC published its endorsement of Reference (d) in the Federal Register on February 26, 2013 (Reference (e)).

Nine Mile Point Nuclear Station, LLC (NMPNS), Units 1 (NMP1) and 2 (NMP2), R.E. Ginna Nuclear Power Plant, LLC (Ginna), and Calvert Cliffs Nuclear Power Plant, LLC (CCNPP) will utilize Electric Power Research Institute (EPRI) Technical Report 1025287 (Reference (d)), for the requested seismic hazard evaluations and risk assessments as endorsed by the NRC in Reference (e).

Required Response 2 of Enclosure 1 of Reference (a) requested that each licensee in the Central and Eastern United States (CEUS) submit a seismic hazard evaluation within 1.5 years of the date of the information request (i.e., September 12, 2013). As defined in Reference (f), the industry is updating the EPRI (2004, 2006) ground motion attenuation model to include recently obtained data and the latest views of the technical experts. CENG intends to use this updated model rather than the older version of the model to respond to the NRC's Request for Information provided in Reference (a). However, the updated ground motion model has not been endorsed or accepted by the NRC (References (g) and (h)). As a result, CENG proposes the following alternative schedule to comply with Required Response 2 of Enclosure 1 of Reference (a) for NMPNS, Ginna, and CCNPP:

1. The base case velocity profile and supporting subsurface materials and properties (EPRI Technical Report 1025287 (Reference (d)), Section 4, "Seismic Hazard and Screening Report," 2nd Bullet, "Seismic Hazard Results: GMRS," Items 3.a and 3.b) will be submitted by September 12, 2013; and

2. The remaining EPRI Technical Report 1025287 (Reference (d)), Section 4, "Seismic Hazard and Screening Report," information will be submitted seven months following the NRC endorsement of the revised EPRI ground motion attenuation model for the CEUS, or the NRC determination that the industry is unable to address its concerns with the EPRI updated ground motion model for CEUS licensees.

In Reference (b), CENG also stated that this letter would assess our capability to meet the submittal deadlines for the Seismic Risk Evaluation and take appropriate regulatory action. Required Responses 4 and 5 of Enclosure 1 of Reference (a) outline a schedule for performing Seismic Risk Evaluations, if necessary, that are predicated on a time period following the NRC priority determination. CENG is proposing an alternate schedule for completion of the Seismic Risk Evaluations, if necessary, for NMP1, NMP2, Ginna, and CCNPP, that is based on completion of the CENG Seismic Hazard Evaluations and NRC determination of the prioritization schedule. CENG intends to utilize the Expedited Seismic Evaluation Process (ESEP) defined in Reference (f) followed by plant risk evaluations in accordance with Reference (d) or Reference (i). The ESEP includes a screening process for performing the near term evaluations, as well as equipment selection, seismic evaluation, and modification criteria. The NRC has not endorsed or accepted the ESEP at this time.

CENG intends to perform the following for those plants that do not screen out of ESEP and/or Seismic Risk Assessments based on the ground motion response spectra versus safe shutdown earthquake screening: 1) ESEP activities, including associated modifications, within the schedule outlined in Reference (f) and 2) Seismic Risk Assessment for each plant within the designated schedule outlined in Reference (f). The dates for the ESEP activities and Seismic Risk Assessments for NMP1, NMP2, Ginna, and CCNPP will be affirmed by CENG within 60 days of NRC endorsement of the Augmented Approach guidance.

This letter contains regulatory commitments as listed in Attachment (1).

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 26, 2013.

Sincerely,



Mary G. Kofsnick

MGK/STD

Attachment (1): List of Regulatory Commitments

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)

LIST OF REGULATORY COMMITMENTS

ATTACHMENT (1)

LIST OF REGULATORY COMMITMENTS

The following table identifies actions committed to in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Regulatory Commitment	Date
Submit the base case velocity profile and supporting subsurface materials and properties (Electric Power Research Institute (EPRI) Technical Report 1025287, Section 4, "Seismic Hazard and Screening Report," 2 nd Bullet, "Seismic Hazard Results: GMRS," Items 3.a and 3.b) for Nine Mile Point Nuclear Station, LLC (NMPNS), R. E. Ginna Nuclear Power Plant, LLC (Ginna), and Calvert Cliffs Nuclear Power Plant, LLC (CCNPP)	September 12, 2013
Submit the remaining EPRI Technical Report 1025287, Section 4, "Seismic Hazard and Screening Report," information for NMPNS, Ginna, and CCNPP	Seven months following the NRC endorsement of the revised EPRI ground motion attenuation model for the Central and Eastern United States (CEUS), or the NRC determines that the industry is unable to address its concerns with the EPRI updated ground motion model for CEUS licensees
Submit a schedule for implementing the Expedited Seismic Evaluation Program (ESEP) activities and the Seismic Risk Assessments for Nine Mile Point Units 1 and 2, Ginna, and CCNPP	Within 60 days after NRC's endorsement, acceptance or rejection of the Augmented Approach guidance