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10 CFR 50.4  
10 CFR 52.79

April 30, 2014

UN#14-040

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016  
Response to Request for Additional Information for the  
Calvert Cliffs Nuclear Power Plant, Unit 3,  
RAI 408, Emergency Planning

- References:
- 1) Surinder Arora (NRC) to Paul Infanger (UniStar Nuclear Energy), "CCNPP3 - Final RAI 408 NSIR EP 7297," dated December 20, 2013
  - 2) UniStar Nuclear Energy Letter UN#14-005, from Paul Infanger to Document Control Desk, U.S. NRC, Schedule Information for Response to Request for Additional Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI 408, Emergency Planning, dated January 16, 2014

The purpose of this letter is to provide a supplemental response to the request for additional information (RAI) 408, identified in the NRC e-mail correspondence to UniStar Nuclear Energy, dated December 20, 2013 (Reference 1). This RAI addresses Emergency Planning, as discussed in Section 13.3 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA), Revision 9.

Reference 2 indicated that the response to RAI 408, Questions 13.03-59 through 13.03-66 would be provided to the NRC by April 30, 2014.

Enclosure 1 provides our response to RAI 408, Questions 13.03-59 through 13.03-66, and includes revised COLA content. Enclosure 2 provides the COLA impact of the response to RAI

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408 Questions 13.03-59, -60, and -64. A Licensing Basis Document Change Request has been initiated to incorporate these changes into a future revision of the COLA.

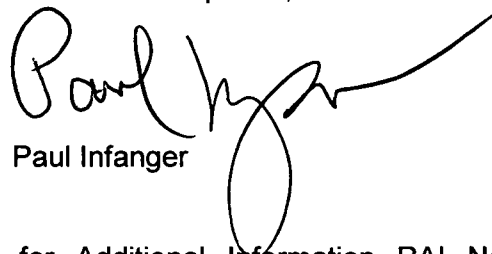
Enclosure 3 provides a table of changes to the CCNPP Unit 3 COLA associated with RAI 408, Questions 13.03-59 through 13.03-66.

Our response does not include any new regulatory commitments. This letter and its enclosures do not contain any sensitive or proprietary information.

If there are any questions regarding this transmittal, please contact me at (410) 369-1987 or Mr. Mark Finley at (410) 369-1907.

*I declare under penalty of perjury that the foregoing is true and correct.*

Executed on April 30, 2014



Paul Infanger

- Enclosures:
- 1) Response to NRC Request for Additional Information RAI No. 408, Questions 13.03-59 through 13.03-66, Emergency Planning, Calvert Cliffs Nuclear Power Plant, Unit 3
  - 2) Changes to CCNPP Unit 3 COLA Associated with the Response to RAI 408, Questions 13.03-59, -60, and -64, Calvert Cliffs Nuclear Power Plant, Unit 3
  - 3) Table of Changes to CCNPP Unit 3 COLA Associated with the Response to RAI No. 408, Questions 13.03-59 through 13.03-66, Calvert Cliffs Nuclear Power Plant, Unit 3

cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch  
Tomeka Terry, NRC Environmental Project Manager, U.S. EPR COL Application  
George Wunder, NRC Project Manager, U.S. EPR DC Application, (w/o enclosures)  
Patricia Holahan, Acting Deputy Regional Administrator, NRC Region II, (w/o enclosures)  
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2  
David Lew, Deputy Regional Administrator, NRC Region I (w/o enclosures)

**Enclosure 1**

**Response to NRC Request for Additional Information  
RAI No. 408, Questions 13.03-59 through 13.03-66,  
Emergency Planning,  
Calvert Cliffs Nuclear Power Plant, Unit 3**

**RAI No. 408**

**Question 13.03-59**

**Followup to RAI 299, Question 13.03-44:**

In a May 19, 2011, response to RAI 299, Question 13.03-44, the applicant provided letters of certification from the State of Delaware, the District of Columbia, and the local counties of St. Mary's, Dorchester, and Calvert County, Maryland. However, these letters of certification were not included in Revision 8 of the CCNPP Unit 3 Emergency Plan. Provide the appropriate letters of certification per the regulations in 10 CFR 52.79(a)(22)(i) or explain why this is not necessary.

**Response**

The May 19, 2011, response to RAI 299, Question 13.03-44<sup>1</sup> indicated that the letters of certification for the State of Delaware, the District of Columbia, and the local counties of St. Mary's, Dorchester, and Calvert would be placed in Part 11H of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA). The letters were included in Part 11H of the CCNPP Unit 3 COLA Revision 8 transmittal<sup>2</sup>. A pointer has been added to the Emergency Plan (Part II – Planning Standards and Criteria) to indicate that the letters are located in COLA Part 11H – State and Local Emergency Plans.

**COLA Impact**

Enclosure 2 provides the COLA markups associated with the response to RAI 408, Question 13.03-59.

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<sup>1</sup> UniStar Nuclear Energy Letter UN#11-154, from Greg Gibson to Document Control Desk, U.S. NRC, Response to Request for Additional Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI 299, SRP Section 13.03 - Emergency Planning, dated May 19, 2011

<sup>2</sup> UniStar Nuclear Energy Letter UN#12-026, from Mark T. Finley to Document Control Desk, U.S. NRC, "Submittal of Revision 8 to the Combined License Application for the Calvert Cliffs Nuclear Power Plant, Unit 3, and Application for Withholding of Documents, dated March 27, 2012



### **13.03-60**

#### **Followup to RAI 372, Question 13.03-54:**

In a February 28, 2013, response to RAI 372, Question 13.03-54, the applicant revised the emergency plan to reflect the emergency action levels (EALs) developed in accordance with NEI 99-01, Revision 5, and revised license condition 8 in Part 10 of the CCNPP Unit 3 COL application to include State and local government review and approval of the final (complete) EALs to be submitted to the NRC.

The applicant proposes two deviations from NEI 99-01, Revision 5 specifically for (1) Containment Potential Loss Threshold 4.C and (2) Loss of Indication EALs. These specific deviations need to be addressed in the applicable license condition. Please revise the license condition to address these deviations or explain why this is not necessary.

#### **Response**

At the time that the February 28, 2013, response to RAI 372, Question 13.03-54<sup>3</sup> was submitted, the U.S. Nuclear Regulatory Commission (NRC) had not yet provided an endorsement of NEI 99-01, Revision 6 (Revision 5 was endorsed). The basis for using NEI 99-01, Revision 5 with two deviations, was that the two deviations were consistent with NEI 99-01, Revision 6. The NRC provided the endorsement of NEI 99-01, Revision 6 on March 28, 2013<sup>4</sup>.

The Emergency Plan (Part II – Planning Standards and Criteria) has been revised to indicate that an Emergency Action Level (EAL) scheme based on Revision 6 of NEI 99-01, "Methodology for Development of Emergency Action Levels," is used for Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3. Combined License Application (COLA) Part 10, license condition 8, has been revised to indicate that EALs shall be submitted in accordance with NEI 99-01, Revision 6. Since NEI 99-01, Revision 6, is currently endorsed by the NRC and UNE has a license condition to use NEI 99-01, Revision 6, the deviations are no longer required. Therefore, no license conditions are being added to the COLA.

#### **COLA Impact**

Enclosure 2 provides the COLA markups associated with the response to RAI 408, Question 13.03-60.

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<sup>3</sup> UniStar Nuclear Energy Letter UN#13-015, from Mark T. Finley to Document Control Desk, U.S. NRC, Revised Partial Response to Request for Additional Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI 372, Emergency Planning, dated February 28, 2013

<sup>4</sup> U.S. Nuclear Regulatory Commission letter to the Nuclear Energy Institute, ADAMS No. ML12346A463, U.S. Nuclear Regulatory Commission Review and Endorsement of NEI 99-01, Revision 6, dated November, 2012 (TAC NO. D92368), dated March 28, 2013

**13.03-61**

**Followup to RAI 155, Question 13.03-14(D):**

Based on the staff's review of the applicant's prior response to RAI 155, Question 13.03-14(D) and the information contained in Revision 8 of the CCNPP Unit 3 Emergency Plan, the staff has determined the applicant did not maintain these changes in Revision 8 of the CCNPP Unit 3 Emergency Plan as committed to in the RAI responses and as changed in Revision 7 of the CCNPP Unit 3 Emergency Plan. Specifically, In a November 19, 2009, response to RAI 155, Question 13.03-14(D), the applicant committed to revise the CCNPP Unit 3 Emergency Plan to address the 24/7 availability of National Weather Service (NWS) information for the Calvert Cliffs area. Please revise the CCNPP Unit 3 Emergency Plan to include the previously submitted information that was reviewed and found acceptable, or explain why this is not necessary.

**Response**

The Combined License Application (COLA) Part 5, Emergency Plan, Part II, Section A.1.a.1 change provided in the November 19, 2009, response to RAI 155, Question 13.03-14<sup>5</sup> has been reestablished. This omission occurred during COLA production. A condition report regarding this omission has been entered into the UniStar Nuclear Energy corrective action program for disposition.

**COLA Impact**

COLA Part 5, Emergency Plan, Part II, Section A.1.a.1 has been revised as follows:

**Section A: Assignment of Responsibility**

**1. Concept of Operations**

...

- a. Identified below are federal, {state}, and local organizations (and other local governmental agencies) that are involved in a response to an emergency at {CCNPP Unit 3}.

1) Federal Agencies: The National Response Framework (NRF), Nuclear/Radiological Incident Annex outlines the statutory and regulatory responsibilities. The primary federal response for supporting an emergency at CCNPP Unit 3 includes:

...

- i) National Weather Service (NWS): Provides meteorological information during emergency situations, if required. Local area Ddata, available 24 hours a day / 7 days a week via the forecast.weather.gov website, will include existing and forecasted wind directions, wind speed, and ambient air temperature.

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<sup>5</sup> UniStar Nuclear Energy Letter UN#09-446, from Greg Gibson to Document Control Desk, U.S. NRC, Response to Request for Additional Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI No. 155, Emergency Planning, dated November 19, 2009

**13.03-62**

**Followup to RAI 155, Question 13.03-15(E):**

Based on the staff's review of the applicant's prior response to RAI 155, Question 13.03-15(E) and the information contained in Revision 8 of the CCNPP Unit 3 Emergency Plan, the staff has determined that the applicant did not provide these changes in Revision 8 of the CCNPP Unit 3 Emergency Plan as committed to in the RAI response and as changed in Revision 7 of the CCNPP Unit 3 Emergency Plan.

Specifically, In a November 19, 2009, response to RAI 155, Question 13.03-15(E), the applicant committed to revise the CCNPP Unit 3 Emergency Plan to explicitly acknowledge that areas recommended to be evacuated are retained when new PARs are issued for wind shifts.

Please revise the CCNPP Unit 3 Emergency Plan to include the previously submitted information that was reviewed and found acceptable, or explain why this is not necessary.

**Response**

The Combined License Application (COLA) Part 5, Emergency Plan, Part II, Section J.10 change provided in the November 19, 2009, response to RAI 155, Question 13.03-15<sup>5</sup> has been reestablished. This omission occurred during COLA production. A condition report regarding this omission has been entered into the UniStar Nuclear Energy corrective action program for disposition.

**COLA Impact**

COLA Part 5, Emergency Plan, Part II, Section J.10 has been revised as follows:

**Section J: Protective Response**

...

**10. Implementation of Protective Action Recommendations**

...

- m. At a General Emergency classification, the Licensee will provide the {state} with recommendations for protective actions for the public. For incidents involving actual, potential, or imminent releases of radioactive material to the atmosphere, EPA 400-R-92-001, the NRC Response Technical Manual (RTM-96) and NUREG-0654, Supp. 3 are used as the basis for the general public PARs.

Areas previously recommended for evacuation are retained when new PARs are issued for wind shifts.

**13.03-63**

In the Table of Contents to Revision 8 of the CCNPP Unit 3 Emergency Plan, dated March 2013, and received by NRC on May 13, 2013, Annex 1, "Calvert Cliffs Nuclear Power Plant Unit 3 EAL Technical Bases Manual" is identified, but not included as an annex to the document. Please clarify if this document was intended to be submitted with Revision 8 of the CCNPP Unit 3 Emergency Plan and provide the document.

**Response**

The Table of Contents (TOC) of the Revision 8 to the Combined License Application Part 5, Emergency Plan transmitted on April 25, 2013<sup>6</sup> incorrectly listed three annexes. The Emergency Plan TOC has been revised to delete mention of these annexes.

**COLA Impact**

COLA Part 5, Emergency Plan, Table of Contents, has been revised as follows:

**Table of Contents**

<b><u>Section</u></b>	<b><u>Page</u></b>
<b>Part III: APPENDIXES</b>	
Appendix 1: References .....	1-1
Appendix 2: Procedure Cross-Reference to NUREG-0654 .....	2-1
Appendix 3: Letters of Agreement (Certification Letters) .....	3-1
Appendix 4: Glossary of Terms and Acronyms .....	4-1

**~~LIST OF ANNEXES~~**

~~Annex 1: Calvert Cliffs Nuclear Power Plant Unit 3 EAL Technical Bases Manual~~  
~~Annex 2: Calvert Cliffs Nuclear Power Plant Unit 3 ERO On-Shift Staffing Analysis Report~~  
~~Annex 3: Calvert Cliffs Evacuation Time Estimate Study~~

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<sup>6</sup> UniStar Nuclear Energy Letter UN#13-032, from Mark T. Finley to Document Control Desk, U.S. NRC, Revision 8 to the Combined License Application Part 5, Emergency Plan Calvert Cliffs Nuclear Power Plant, Unit 3, dated April 25, 2013

**13.03-64**

Table B-1b, "Minimum Staffing Requirements for the CCNPP Unit 3 ERO" in Revision 8 of the CCNPP Unit 3 Emergency Plan includes an asterisk (\*) by the column labelled, "\*\*75 Minute Augmentation;" however, the asterisk is not defined in the footnotes to the table. Please revise this table to provide the definition of the asterisk.

**Response**

The asterisk has been deleted from Table B-1b, "Minimum Staffing Requirements for the CCNPP Unit 3 ERO" of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Emergency Plan. The note associated with this asterisk was deleted from Table B-1b in Revision 8 of the Emergency Plan. Therefore, the asterisk should have also been deleted.

**COLA Impact**

Enclosure 2 provides the COLA markups associated with the response to RAI 408, Question 13.03-64.



### 13.03-65

Section H.1.d in Revision 8 of the CCNPP Unit 3 Emergency Plan describes the establishment of an alternative mustering facility in the event of a hostile action at the site. According to the final EP rule and guidance in NSIR/DPR-ISG-01, Section IV.D, alternative facilities should have the capability to perform offsite notifications of a plant emergency. Does the alternate mustering facility have the capability to perform offsite notifications in the event of an emergency as required by Appendix E to 10 CFR Part 50, Section IV.E.8.d and in accordance with the guidance in NSIR/DPR-ISG-01, Section IV.D.2?

### Response

The Emergency Operations Facility (EOF) has been established as the mustering facility. The EOF has the capability to perform offsite notifications in the event of an emergency as required by Appendix E to 10 CFR Part 50, Section IV.E.8.d and in accordance with the guidance in NSIR/DPR-ISG-01, Section IV.D.2.

### COLA Impact

COLA Part 5, Emergency Plan, Part II, Section H, has been revised as follows:

### Section H: Emergency Facilities and Equipment

...

#### **1. Control Room, Technical Support Center, and Operations Support Center**

...

#### **d. Alternate Mustering Facility**

The EOF ~~An alternate facility~~ has been established as the mustering facility. It is ~~and~~ equipped for security and other events which may prevent response of the ERO to the primary Emergency Response Facilities onsite. The facility is located approximately ~~tentwelve (1012)~~ miles from the station and has the following capabilities:

- Is accessible even if site is under threat of or experiencing hostile actions.
- Is large enough to accommodate the TSC and OSC staffs.
- Has communications equipment to communicate with the ~~EOF~~, Control Room and plant security.
- Allows for rapid response to station when accessibility is restored.
- Has access to minimal plant drawing and procedures to allow for limited assessment by TSC staff.

**13.03-66**

The Evacuation Time Estimate for CCNPP Unit 3, dated March 2011 and included as Annex 3 in Revision 8 of the CCNPP Unit 3 Emergency Plan, considered 14 evacuation regions and 14 evacuation scenarios. The Evacuation Time Estimate for CCNPP Units 1 and 2, dated November 2012, considered 17 evacuation regions and 15 evacuation scenarios. It is understood that the emergency plans for Units 1 and 2 are dynamic in nature and may change over time, prior to the construction of Unit 3. Explain what actions are planned to ensure a consistent planning basis is used for all units at the site once the emergency preparedness program for Unit 3 is established.

**Response**

The most recent Evacuation Time Estimate (ETE) for Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3, is dated August 15, 2013. This ETE report was transmitted to the U.S. Nuclear Regulatory Commission on October 9, 2013<sup>7</sup>. The August 15, 2013, ETE report considers 17 evacuation regions and 15 evacuation scenarios. The COLA Part 5, Emergency Plan, Unit 3 Impact to Units 1 & 2 Evaluation, has been revised to indicate that the August 15, 2013, ETE report is applicable to CCNPP Unit 3 and to Units 1 & 2 and that the ETE study report accounts for CCNPP Unit 3 construction.

**COLA Impact**

COLA Part 5, Emergency Plan, Unit 3 Impact to Units 1 & 2 Evaluation, Section 3 (Item 6) has been revised as follows:

**3. MULTI-UNIT SITE CONSIDERATIONS**

...

- 6. Address the applicability of the existing ETE or provide a revised ETE, if appropriate.**

...

A revised ETE study report conducted for the site, "Calvert Cliffs Nuclear Power Plant Development of Evacuation Time Estimates", Final Report, dated April 2008 and the "Addendum to Calvert Cliffs Nuclear Power Plant Development of Evacuation Time Estimates", Revision 0, dated August 2008 is provided for CCNPP. The revised ETE contains special site evacuation scenarios which consider the CCNPP3 construction workforce to determine the potential impact on the existing ETEs that could occur. The Evacuation Time Estimates (ETE) study report entitled, "Calvert Cliffs Unit 3 Development of Evacuation Time Estimates," Final Report, Rev. 4, dated August 2013, is applicable to CCNPP Unit 3 and to Units 1 & 2. The ETE study report accounts for CCNPP Unit 3 construction.

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<sup>7</sup> UniStar Nuclear Energy Letter UN#13-131, from Mark T. Finley to Document Control Desk, U.S. NRC, Changes to Combined License Application (COLA) Part 5 Required In Response to Advisory Committee on Reactor Safeguards U.S. EPR Subcommittee Action Items, Calvert Cliffs Nuclear Power Plant, Unit 3, dated October 9, 2013

**Enclosure 2**

**Changes to CCNPP Unit 3 COLA  
Associated with the Response to RAI 408, Questions 13.03-59, -60, and -64,  
Calvert Cliffs Nuclear Power Plant, Unit 3**

## **PART II: Planning Standards And Criteria**

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### **Section A: Assignment of Responsibility**

This section describes the primary responsibilities and organizational control of licensee, federal, state, local, and other emergency response organizations within the Plume Exposure Pathway and the Ingestion Pathway Emergency Planning Zones (EPZs). Various supporting organizations are also described as well as staffing for initial and continuous response.

#### **1. Concept of Operations**

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The relationships and the concept of operations for the organizations and agencies that are a part of the overall ERO are as follows:

- a. Identified below are federal, state, and local organizations (and other local governmental agencies) that are involved in a response to an emergency at CCNPP Unit 3.

- 1) Federal Agencies: The National Response Framework (NRF), Nuclear/Radiological Incident Annex outlines the statutory and regulatory responsibilities. The primary federal response for supporting an emergency at CCNPP Unit 3 includes:

- a) Nuclear Regulatory Commission (NRC): The NRC is responsible for licensing and regulating nuclear facilities and materials and for conducting research in support of the licensing and regulatory process. These responsibilities include protecting the public health and safety, protecting the environment, protecting and safeguarding materials and plants in the interest of national security and assuring conformity with antitrust laws.

The NRC Regional Office has the responsibility for auditing of nuclear power plants. It is responsible for ensuring that such activities are conducted in accordance with the terms and conditions of such NRC licenses and that as a result of such operations, there is no undue risk to the health and safety of the public.

The NRC Office of Nuclear Reactor Regulation, established by the Energy Reorganization Act of 1974, as amended, performs licensing functions associated with the construction and operation of nuclear reactors and with the receipt, possession, ownership, and use of special nuclear and byproduct materials used at reactor facilities.

With regard to emergency preparedness, the NRC shall:

- Assess licensee emergency plans for adequacy;
- Review the Federal Emergency Management Agency (FEMA) findings and determinations on the adequacy and capability of implementation of state and local plans; and
- Make decisions with regard to the overall state of emergency preparedness and issuance of operating licenses.



## PART II: Planning Standards And Criteria

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The NRC shall respond to incidents at licensed facilities or vehicular accidents involving licensed materials, including radionuclides, in transit. The NRC shall act as the lead Federal agency with regard to technical matters during a nuclear incident including radiological assistance. The NRC shall be prepared to recommend appropriate protective actions for the public and technical actions to the licensee. FEMA shall act as the lead Federal agency for offsite, non-technical concerns.

During an incident, the Chairman of the Commission is the senior NRC authority for all aspects of a response. The Chairman shall transfer control of emergency response activities to the Director of Site Operations when deemed appropriate by the Chairman.

All NRC Regions as well as Headquarters are prepared to respond to potential emergencies. All Regions and Headquarters have developed plans and procedures for responding to radiological incidents involving NRC licensees. Headquarters has developed the NRC Incident Response Plans and Implementing Procedures. Each NRC Region has developed Regional Supplements that detail how the Region will fulfill all of the responsibilities assigned in the NRC Incident Response Plan. All NRC organizations are responsible for maintaining an effective state of preparedness through periodic training, drills and exercises.

Each Region and Headquarters has established and maintains an Incident Response Center designed to centralize and coordinate the emergency response function. Adequate communications are established to link the licensee, Headquarters and the Region. The NRC has established lines of communications with local government, state government, other Federal agencies, Congress and the White House. Public information will be disseminated in a timely manner and periodically.

Each Region is prepared to send a team of qualified specialists to the scene expediently. All of the necessary supplies and equipment needed for emergency response will be provided and maintained by the NRC.

The NRC Incident Response Plan objectives are to provide for protection of the public health and safety, property, and the environment, from the effects of radiological incidents that may occur at licensed facilities or which involve licensed materials, including radio-nuclides in transit.

The objectives of the agency plan set forth the organizational and management concepts and responsibilities needed to assure that NRC has an effective emergency response program.

The plan is intended to ensure NRC preparedness:

- To receive and evaluate notification information of incidents, accidents and unusual events and determine the extent of NRC response necessary to meet NRC responsibilities for mitigating the consequences of these events;
- To determine the cause of incidents, accidents, and unusual events in order to ensure that appropriate corrective actions are taken by the licensee to minimize the consequences of these events;



## **PART II: Planning Standards And Criteria**

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- To provide onsite expertise in a timely manner, to evaluate the nature and extent of the incident, ascertain plant status (for reactors and fuel facilities), monitor licensee activities, determine compliance, make recommendations, and, if necessary, issue orders relative to the event;
  - To inform the public and others of plant status and technical details concerning the incident;
  - To recommend adequate protective actions to the responsible local and/or state agencies;
  - To provide technical assistance;
  - To ensure the plant is returned to a safe condition; and
  - To return the NRC Headquarters and Regional office to normal operations.
- b) Department of Homeland Security (DHS): Per the National Response Framework (NRF), DHS is responsible for the overall coordination of a multi-agency Federal response to a significant radiological incident. The primary role of DHS is to support the state by coordinating the delivery of Federal non-technical assistance. DHS coordinates state requests for Federal assistance, identifying which Federal agency can best address specific needs. If deemed necessary by DHS, it will establish a Federal Response Center from which it will manage its assistance activities.
- Federal Emergency Management Agency (FEMA): FEMA is the agency within DHS which provides direct support to state and local agencies in emergency response.
- c) Federal Radiological Preparedness Coordinating Committee (FRPCC): The FRPCC consists of FEMA, which chairs the Committee, the Nuclear Regulatory Commission, the Environmental Protection Agency, the Department of Health and Human Services, the Department of Energy, the Department of Transportation, the Department of Defense, the Department of Agriculture, the Department of Commerce, and where appropriate and on an ad hoc basis, other Federal departments and agencies. The FRPCC shall assist FEMA in providing policy direction for the program of Federal assistance to state and local governments in their radiological emergency planning and preparedness activities.
- d) U.S. Department of Energy (DOE): The Department of Energy (DOE) has extensive radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. The Department of Energy (DOE) local operations office can assist CCNPP Unit 3 following a radiological incident as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). If CCNPP Unit 3, the NRC or the affected states deem that assistance from DOE is necessary or desirable, the affected state(s) would notify the appropriate DOE operations office.
- e) Environmental Protection Agency (EPA): Assists with field radiological monitoring/sampling and non-plant related recovery and reentry guidance.



## **PART II: Planning Standards And Criteria**

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- f) The U.S. Coast Guard (USCG): The USCG patrols and ensures the safety of navigable waterways in the United States. The USCG is promptly notified of any oil or hazardous substance discharges into rivers or lakes or radioactive contamination of rivers or lakes under its jurisdiction at levels requiring assistance to effect protective actions. The USCG is contacted by the appropriate state agencies in the event of an incident at an applicable nuclear power plant. The USCG is responsible for officially closing the waterways to all commercial traffic. Refer to the Maryland State Plan.
- g) U.S. Army Corps of Engineers: The U.S. Army Corps of Engineers control barge and boat traffic at locks and dams on navigable waterways in the United States. The Corps of Engineers will be contacted by the appropriate state agencies in the event of an incident at an applicable nuclear power plant. The Corps will be responsible for closing their locks and dams to all waterway traffic leading to the affected area, allowing only traffic leaving the area. Refer to the appropriate Maryland State Plan.
- h) Federal Bureau of Investigation (FBI): Support from the FBI is available through its statutory responsibility based in Public Law and the US code, and through a memorandum of understanding for cooperation with the NRC. Notification to the FBI of emergencies in which they would have an interest will be through provisions of the site's Nuclear Security Plan, or by the NRC.
- i) National Weather Service (NWS): Provides meteorological information during emergency situations, if required. Data available will include existing and forecasted wind directions, wind speed, and ambient air temperature.
- j) Department Of Energy (DOE): Radiation Emergency Assistance Center/Training Site (REAC/TS): DOE REAC/TS provides services of medical and health physics support. REAC/TS advise on the health physics aspects of situations requiring medical assistance.

### **2) State Agencies**

- a) The State of Maryland The State of Maryland has the statutory responsibility and authority for protecting the health and safety of the public in Maryland. The State has developed the Maryland Radiological Emergency Plan. This plan was developed in accordance with the guidance suggested by NUREG 0396 and NUREG 0654/FEMA-REP-1, Rev. 1. The Maryland Plan has received 44 CFR 350 unconditional approvals from FEMA for all nuclear generating plant(s) within the state boundaries. Maryland Radiological Emergency Plan, Annex Q, describes State and local agency roles and interfaces for carrying out protective and parallel actions in a 10-mile-radius plume zone and 50-mile-radius ingestion zone from CCNPP Unit 3 site. Basic descriptions for the Maryland State agencies responsible for actions during an event at a nuclear power plant are as follows:
  - Governor of Maryland: The Governor of the State has overall command authority for both the radiological and non-radiological aspects of a nuclear incident. The Governor shall make the final recommendation for protective actions with input from the Secretary - Maryland Department of Environment (MDE) and shall serve as the state's primary spokesperson.



## PART II: Planning Standards And Criteria

- Maryland Emergency Management Agency (MEMA): Coordinates the operational response and recovery functions of all State, private, and Federal agencies. MEMA directs County requests for assistance to appropriate State and Federal agencies.
- Maryland Department of the Environment (MDE): Proposes Protective Action Decisions (PADs) to the Secretary – Department of the Environment.

MDE has both the command authority for radiological aspects of a nuclear incident and the responsibility for performing various radiological functions. These functions include milk, water and food control, radiation exposure control for state emergency workers, and confirmatory accident assessment.

For events that impact the CCNPP' 50-mile (80-kilometer) ingestion pathway, MDE will coordinate technical information with the other states which may be impacted.

The State of Delaware certification letter and Radiological Emergency Plan are located in CCNPP Unit 3 COLA Part 11H.

- b) The State of Delaware: A portion of the 50-mile (80-kilometer) Ingestion Pathway Emergency Planning Zone for CCNPP Unit 3 lies within the State of Delaware. The State of Delaware has developed a Radiological Emergency Plan outlining necessary response actions.

The District of Columbia certification letter and Emergency Plan are located in CCNPP Unit 3 COLA Part 11H.

- c) The Commonwealth of Virginia: A portion of the 50-mile (80-kilometer) Ingestion Pathway Emergency Planning Zone for CCNPP Unit 3 lies within the Commonwealth of Virginia. The Commonwealth of Virginia has developed a Radiological Emergency Response Plan outlining necessary response actions.

- d) The District of Columbia: A portion of the 50-mile (80-kilometer) Ingestion Pathway Emergency Planning Zone for CCNPP Unit 3 lies within the District of Columbia. The District of Columbia has developed an Emergency Plan outlining necessary response actions. Functions and activities of agencies responsible for emergency response in the Washington, D.C., portion of the ingestion pathway EPZ are described in the District of Columbia, District Response Plan.

The certification letters for these three counties and their associated Emergency Plans are located in CCNPP Unit 3 COLA Part 11H.

- e) Essential elements of the 50-Mile Plume Exposure emergency plans: Initially, responsibility for responding to a radiological emergency, including evacuation, rests with local governments and their emergency services. Notification, by either local authorities or legal possessors of uncontrolled materials, to the state EMA that a radiological emergency exists will bring in the resources of other state agencies to assess and evaluate the situation and determine protective actions. State agency notification for assistance and coordination of response operations of the state agencies in support of local government will be performed by the MDE.

### 3) County Government Agencies

CCNPP Unit 3 and the surrounding communities that comprise the Plume Exposure Pathway EPZs have developed integrated emergency response programs that call upon the resources of their community. The community organizations are responsible for implementing and coordinating the community response to an emergency.

Calvert County, Dorchester County, and St. Mary's County are within the 10 mile Emergency Planning Zone for CCNPP Unit 3.



## PART II: Planning Standards And Criteria

This page  
provided for  
information  
only.

Calvert County, Dorchester County, and St. Mary's County Radiological Emergency Plans and Standard Operating Procedures summarize the plan used by county agencies within the plume exposure EPZ. Command of county agencies is under the direction of the Board of County Commissioners for each county. Coordination and responsibility for implementing protective actions is the responsibility of the Director of each county's Emergency Management Agency.

The ingestion pathway EPZ for CCNPP Unit 3 includes all or portions of the following Maryland counties:

Anne Arundel County	Queen Anne's County
Calvert County	Somerset County
Caroline County	St. Mary's County
Charles County	Talbot County
Dorchester County	Wicomico County
Kent County	Worcester County
Prince George's County	

Functions and responsibilities of agencies responsible for emergency response are described in the Maryland Emergency Operations Plan, Annex Q, and Radiological Emergency Plan.

The ingestion pathway EPZ for CCNPP Unit 3 includes all or portions of the following Virginia political subdivisions:

### Counties

Accomack (Tangier Island)	Lancaster
Arlington	Middlesex
Caroline	Northumberland
Essex	Prince William
Fairfax	Richmond
King George	Stafford
King and Queen	Westmoreland

### Cities

Alexandria	Falls Church
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Functions and activities of these agencies are described in the Virginia Radiological Emergency Response Plan. The County Emergency Operations Centers (EOCs) serve as the primary coordinating center for local government response within the county's jurisdiction and for coordination between counties

- b. During an emergency condition classified as an Alert, Site Area Emergency, or General Emergency, the Site's ERO replaces the normal plant organization. The ERO consists of three major response sub-organizations:
- 1) The Plant Organization, directed by the Emergency Plant Manager provides for:
    - Control and operation of the plant.
    - Mitigation of the emergency condition.
    - Protection of site personnel.

## PART II: Planning Standards And Criteria

Editor's note: Please delete the asterisk.

Table B-1b: Minimum Staffing Requirements for the CCNPP Unit 3 ERO

Functional Area	Major Tasks	Emergency Positions	Minimum Staffing		
			*75 Minute Augmentation	Other On-Call	Full Augmentation
1. Plant Operations and Assessment of Operational Aspects	Control Room Staff	See Table B-1a for Shift Staffing. <sup>(e)</sup>			
2. Emergency Direction and Control	Command and Control	Shift Manager (Interim ED) <sup>(e)</sup> (CR) Emergency Plant Manager (TSC) Emergency Director (EOF)	1 1		
3. Notification & Communication	Emergency Communications	Plant Shift Personnel <sup>(e)</sup> TSC Director (TSC) EOF Director (EOF) TSC/EOF Communicators: ENS Communicator (TSC) HPN Communicator (EOF) State/Local Communicator (EOF) OPs Communicator (CR/TSC) Operations Advisor (EOF) Communicator (CR/TSC/OSC)	1 1 1 1		1 2 1 3(a)
	Plant Status Technical Activities In-Plant Team Control Governmental	EOC Communicator (EOF) State EOC Liaison (State EOC) County EOC Liaison (County EOC) Regulatory Liaison (EOF)			(b) 1 (b) 1
4. Radiological Assessment	Offsite Dose Assessment	Plant Shift Personnel <sup>(e)</sup> Rad Assessment Coordinator (EOF) Rad Assessment Specialist (EOF) Rad Controls Coordinator (OSC)	1		1 1
	Offsite Surveys	Environmental Assessment Dir (EOF) Offsite Monitoring Team Personnel	1 4		1(b)
	Onsite Surveys	Onsite Monitoring Team Personnel	2		(b)
	In-plant Surveys	RP Personnel <sup>(e)</sup>	2		(b)
	Chemistry	Chemistry Personnel <sup>(e)</sup>	1		(b)
	RP Supervisory	Radiation Protection Manager (TSC) Rad Assessment Director (EOF)	1 1		



## PART II: Planning Standards And Criteria

Editor's note: Please delete the asterisk.

Functional Area	Major Tasks	Emergency Positions	Minimum Staffing		Full Augmentation
			*75 Minute Augmentation	Other On-Call	
5. Plant System Engineering, Repair, and Corrective Actions	Technical Support / Accident Analysis	Shift Technical Advisor <sup>(e)</sup> (CR)			
		Engineering Director (TSC)	1		
		Reactor Engineer (TSC)	1		
		Mechanical Engineer (TSC)	1		
		Electrical Engineer (TSC)	1		
		Operations Manager (TSC)	1		1
		Radiation Controls Engineer (TSC)			1
		Technical Support Manager (EOF)			
	Repair and Corrective Actions	Mechanical Maintenance (OSC)	2		(b)
		Electrical/I&C Maintenance (OSC)	3		(b)
		Maintenance Manager (TSC)	1		
		OSC Director (OSC)	1		
		OSC Leads <sup>(f)</sup> & Team Members (OSC)			(b)
6. In-Plant Protective Actions	Radiation Protection	RP Personnel <sup>(e)</sup>	4		(b)
7. Fire Fighting	--	Fire Brigade			(c)
8. 1 <sup>st</sup> Aid and Rescue Operations	--	Plant Personnel			(b)
9. Site Access Control and Personnel Accountability 10. Resource Allocation and Administration	Security & Accountability Logistics	Security Team Personnel	(d)		
		Security Coordinator (TSC)			1
		Administrative Support Manager (EOF)	1		
	Administration Facility Support	Administrative Support Manager (TSC)			1
		Clerical Staff (TSC/EOF)			1(b)
		Computer Support <sup>(g)</sup> (EOF)			1

## PART II: Planning Standards And Criteria

Editor's note: Please delete the asterisk.

Functional Area	Major Tasks	Emergency Positions	Minimum Staffing		
			*75 Minute Augmentation	Other On-Call	Full Augmentation
11. Public Information	Media Interface	Company Spokesperson (JIC)		1	1
		Rad Protection Spokesperson (JIC)			1
		Technical Spokesperson (JIC)			1
	Information Development	Public Information Director (JIC)		1	1
		Radiological Advisor (JIC)			1
		Technical Advisor (JIC)			1
		News Writer (JIC)			1
		Public Information Liaison (JIC)			1
	Media Monitoring and Rumor Control Facility Operation and Control	Media Monitoring Staff (JIC)			(b)
		Rumor Control Staff (JIC)			(b)
		JIC Director (JIC)		1	1
		JIC Coordinator (JIC)			1
		JIC Administrative Manager (JIC)			1
		Access Control (JIC)			1
		Facility Support Staff (JIC)			(b)
		Clerical Staff			(b)
	<b>TOTAL:</b>		<b>36</b>	<b>3</b>	<b>27<sup>(b)</sup></b>

- (a) May be provided by personnel assigned other functions.
- (b) Personnel numbers depend on the type and extent of the emergency.
- (c) Fire Brigade per FSAR/Technical Specifications, as applicable.
- (d) Per Security Plan.
- (e) All Shift ERO positions are listed in Table B-1a.
- (f) OSC Team Leads can be used to fill technical/craft positions in Maintenance, RP and Chemistry.
- (g) The staff assigned to Computer Support may be dispatched to any facility to assist with computer/communications equipment issues.



## PART II: Planning Standards And Criteria

Determination of a credible security threat may require the staffing of emergency response facilities based on the classification of an Unusual Event per the Emergency Action Levels (EALs).

### 2. Emergency Action Levels

An Emergency Action Level scheme based on Revision 5 of NEI 99-01, "Methodology for Development of Emergency Action Levels," is used for CCNPP Unit 3. ~~The submittal EALs will be written with no deviations other than those attributable to specific U.S. EPR reactor design considerations as follows:~~

- Containment Potential Loss Threshold 4.C Deviation

The U.S. EPR containment volume, condensation surface area, and heat capacities are such that the containment design pressure is not exceeded during design basis Loss of Coolant Accident (LOCA) and Main Steam Line Break (MSLB) events.

In addition, the containment pressure decreases to less than 50% of the accident analysis values in less than 24 hours thus ensuring that radiological dose consequences are acceptable.

Mass and energy releases to the containment during LOCA and MSLB events were calculated using the NRC approved RELAP5/MOD2 (B&W) methodology. Containment pressure responses were calculated using the NRC approved GOTHIC code methodology.

An automatically actuated containment spray system is therefore not required to mitigate the consequences of a Design Basis Accident for the U.S. EPR; therefore, there is no automatic actuation setpoint for this potential loss fission product barrier threshold to be based upon.

- Loss of Indication EAL Deviations

**ECL: ALERT**

**SA2**

**Initiating Condition:** UNPLANNED loss of Control Room indications for 15 minutes or longer with a significant transient in progress.

**Operating Mode Applicability:** Power Operation, Startup, Hot Standby, Hot Shutdown

**Example Emergency Action Levels:**

**Note:** The Emergency Director should declare the Alert promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.

1. a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer.

- Reactor Power
- RCS Level
- RCS Pressure
- Core Exit Temperature
- Level in at least one steam generator



## PART II: Planning Standards And Criteria

- Steam Generator Auxiliary Feed Water Flow

### AND

#### b. ANY of the following transient events in progress:

- Automatic or manual runback greater than 25% thermal reactor power
- Electrical load rejection greater than 25% full electrical load
- Reactor trip
- ECCS (SI) actuation

### Basis:

This IC addresses the difficulty associated with monitoring rapidly changing plant conditions during a transient without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. During this condition, the margin to a potential fission product barrier challenge is reduced. It thus represents a potential substantial degradation in the level of safety of the plant.

As used in this EAL, an "inability to monitor" means that values for one or more of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, digital and recorder source within the Control Room.

An event involving a loss of plant indications, annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine one or more of these parameters from within the Control Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for one or more of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from PICS or SICS, the availability of other parameter values may be compromised as well.

Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.



## **PART II: Planning Standards And Criteria**

### **ECL: UNUSUAL EVENT**

**SU2**

**Initiating Condition:** UNPLANNED loss of Control Room indications for 15 minutes or longer.

**Operating Mode Applicability:** Power Operation, Startup, Hot Standby, Hot Shutdown

#### **Example Emergency Action Levels:**

**Note:** The Emergency Director should declare the Unusual Event promptly upon determining that 15 minutes has been exceeded, or will likely be exceeded.

1. a. An UNPLANNED event results in the inability to monitor one or more of the following parameters from within the Control Room for 15 minutes or longer.

- Reactor Power
- RCS Level
- RCS Pressure
- Core Exit Temperature
- Level in at least one steam generator
- Steam Generator Auxiliary Feed Water Flow

#### **Basis:**

This IC addresses the difficulty associated with monitoring normal plant conditions without the ability to obtain SAFETY SYSTEM parameters from within the Control Room. This condition is a precursor to a more significant event and represents a potential degradation in the level of safety of the plant.

As used in this EAL, an "inability to monitor" means that values for one or more of the listed parameters cannot be determined from within the Control Room. This situation would require a loss of all of the Control Room sources for the given parameter(s). For example, the reactor power level cannot be determined from any analog, digital and recorder source within the Control Room.

An event involving a loss of plant indications, annunciators and/or display systems is evaluated in accordance with 10 CFR 50.72 (and associated guidance in NUREG-1022) to determine if an NRC event report is required. The event would be reported if it significantly impaired the capability to perform emergency assessments. In particular, emergency assessments necessary to implement abnormal operating procedures, emergency operating procedures, and emergency plan implementing procedures addressing emergency classification, accident assessment, or protective action decision-making.

This EAL is focused on a selected subset of plant parameters associated with the key safety functions of reactivity control, core cooling and RCS heat removal. The loss of the ability to determine one or more of these parameters from within the Control Room is considered to be more significant than simply a reportable condition. In addition, if all indication sources for one or more of the listed parameters are lost, then the ability to determine the values of other SAFETY SYSTEM parameters may be impacted as well. For example, if the value for reactor vessel level cannot be determined from PICS or SICS, the availability of other parameter values may be compromised as well.



## **PART II: Planning Standards And Criteria**

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~~Fifteen minutes was selected as a threshold to exclude transient or momentary losses of indication.~~

The development of the EALs is documented in an Emergency Action Level Technical Basis Document. Revision of the EAL Technical Basis Document is controlled the same way as the CCNPP Unit 3 Emergency Plan, requiring the same reviews including a review in accordance with 10 CFR 50.54(q).

Emergency classifications are characterized by Emergency Action Levels (EALs). The Threshold Values are referenced whenever an Initiating Condition is reached. An Initiating Condition is one of a predetermined subset of unit conditions where either the potential exists for a radiological emergency, or such an emergency has occurred. Defined in this manner, an Initiating Condition is an emergency condition, which sets it apart from the broad class of conditions that may or may not have the potential to escalate into a radiological emergency. Initiating Conditions are arranged in one of the Recognition Categories.

EALs are for unplanned events. A planned evolution involves preplanning to address the limitations imposed by the condition, the performance of required surveillance testing, and the implementation of specific controls prior to knowingly entering the condition. Planned evolutions to test, manipulate, repair, perform maintenance or modifications to systems and equipment that result in an EAL Threshold Value being met or exceeded are not subject to classification and activation requirements as long as the evolution proceeds as planned. However, these conditions may be subject to the reporting requirements of 10 CFR 50.72 and/or 10 CFR 50.73.

An emergency is classified after assessing abnormal plant conditions and comparing them to EAL Threshold Values for the appropriate Initiating Conditions. Classifications are based on the evaluation of each unit for multi-reactor sites. Matrix tables organized by recognition categories are used to facilitate the comparison. The matrix tables are used when the unit is in the Technical Specification defined modes of Power Operations (for classification purposes, startup evolutions are included in the Power Operations mode), Hot Standby, Hot Shutdown and Cold Shutdown or Refueling (for classification purposes a defueled plant will be considered in the Refueling mode).

All recognition categories are reviewed for applicability prior to classification. The initiating conditions are coded with a letter and/or number designator. All initiating conditions, which describe the severity of a common condition (series), have the same initial designator.

### **3. Offsite Classification Systems**

The Licensee works with the state to ensure consistency between classification schemes. The initial EALs will be discussed with and agreed upon by the state and local authorities and approved by the NRC. Thereafter, the content of the EALs shall be reviewed with the state and local authorities on an annual basis and significant changes approved by the NRC. Concurrence is obtained from state and local authorities for EAL changes that significantly impact the Initiating Conditions or technical bases.

### **4. Offsite Emergency Procedures**

The Licensee works with the state and local authorities to ensure that procedures are in place that provide for emergency actions to be taken which are consistent with the protective actions recommended by the site, accounting for local offsite conditions that exist at the time of the emergency.



**7. STARTUP TESTING**

COL application FSAR Section 14.2 specifies certain startup tests that must be completed after fuel load. Operating licenses typically have included the following condition related to startup testing.

**PROPOSED LICENSE CONDITION:**

Within one month of any ITP changes described in FSAR Section 14.2, these changes shall be evaluated in accordance with the provisions of 10 CFR 50.59 or Section VIII of the appropriate appendix for the U.S. EPR Design Certification Document under 10 CFR Part 52 and reported in accordance with 10 CFR 50.59(d).

**8. EMERGENCY ACTION LEVELS**

The {CCNPP Unit 3} Emergency Action Levels (EALs) and the associated Technical Bases Manual contains bracketed values requiring plant specific values to be provided that can not be determined until after the COL is issued. These bracketed values are associated with certain site specific values and detailed design information, such as setpoints and instrument numbers. In most cases, this information is necessary to determine EAL thresholds. The initial EALs will be discussed with and agreed upon by State and Local authorities prior to submittal to the NRC for approval.

**PROPOSED LICENSE CONDITION:**

{Calvert Cliffs 3 Nuclear Project, LLC and UniStar Nuclear Operating Services, LLC} shall submit a complete set of plant-specific Emergency Action Levels (EALs) for {CCNPP Unit 3} in accordance with NEI 99-01 Revision 5 to the NRC for confirmation at least 180 days prior to initial fuel load. ~~The submitted EALs will be written with no deviations other than those attributable to specific U.S. EPR reactor design considerations.~~ The initial EALS will be discussed with and agreed upon by State and Local authorities prior to submittal to the NRC for approval.

**9. ENVIRONMENTAL PROTECTION PLAN**

Operating licenses typically have included the following condition related to environmental protection.

**PROPOSED LICENSE CONDITION:**

The issuance of this COL, subject to the Environmental Protection Plan and the conditions for the protection of the environment set forth herein, is in accordance with the National Environmental Policy Act of 1969, as amended, and with applicable sections of 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," as referenced by Subpart C of 10 CFR Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants," and all applicable requirements therein have been satisfied.

**10. MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS****PROPOSED LICENSE CONDITION:**

Prior to initial fuel load, the following requirements will be addressed using the guidance contained in JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses

**Enclosure 3**

**Table of Changes to CCNPP Unit 3 COLA  
Associated with the Response to  
RAI No. 408, Questions 13.03-59 through 13.03-66,  
Calvert Cliffs Nuclear Power Plant, Unit 3**

**Table of Changes to CCNPP Unit 3 COLA  
Associated with the Response to RAI No. 408**

Change ID #	Subsection	Type of Change	Description of Change
<b>Part 5: Emergency Plan</b>			
GN-09-0368	Part II (Section A) and (Section J)	Incorporate COLA markups associated with the response to RAI 155 Questions 13.03-7 through 13.03-21 <sup>5</sup> .	The RAI 155 Question 13.03-14 response involved a change to Emergency Plan, Part II, Section A.1.a.1 and Section J (Protective Response).
CC3-13-0068	Table B-1b	Incorporate COLA markups associated with Revision 8 of the CCNPP Unit 3 COLA Part 5 Emergency Plan <sup>6</sup> .	Incorporate COLA markups associated with Revision 8 of the CCNPP Unit 3 COLA Part 5 Emergency Plan.
CC3-13-0047	Part II (Section D)	Incorporate COLA markups associated with the response to RAI 372, Question 13.03-54 <sup>3</sup> .	The RAI 372 Question 13.03-54 response involved a change to Section 3.1, "Emergency Action Levels (EALs)."
CC3-14-0048	Part II (Section A), Table B-1b, Part II (Section D), Part II (Section H), Part II (Section J)	Incorporate COLA markups associated with the response to RAI 408 Questions 13.03-59 through -65 (this response).	The RAI 408 Questions 13.03-59 through -65 responses (this response) involved a number of corrections to the Emergency Plan.
<b>Part 10: Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) and ITAAC Closure</b>			
GN-12-0182	Appendix A, License Condition 8	Incorporate COLA markups associated with the response to RAI 372 Questions 13.03-52, -53, -54, -55, -56, -57, and -58 <sup>3</sup> .	The RAI 372 Question 13.03-54 response involved a change to Part 10, Appendix A, License Condition 8 (Emergency Action Levels).
GN-14-0049	Appendix A, License Condition 8	Incorporate COLA markups associated with the response to RAI 408 Question 13.03-60 (this response).	The RAI 408 Question 13.03-60 response (this response) involved a change to Part 10, Appendix A, License Condition 8 (Emergency Action Levels).