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May 1, 2015

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

Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Subject: Request for Additional Information Regarding TSTF-425 License Amendment Request

- References:
1. Letter from G. H. Gellrich (Exelon) to Document Control Desk (NRC), dated May 1, 2014, License Amendment Request: Adoption of Technical Specification Task Force Traveler (TSTF) – 425, Revision 3, Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b
 2. Letter from N. S. Morgan (NRC) to G. H. Gellrich (Exelon), dated April 14, 2015, Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 – Request for Additional Information Regarding Technical Specification Task Force Traveler (TSTF) – 425, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," Revision 3 (TAC Nos. MF4065 and MF4066)

Reference 1 submitted a license amendment request to adopt TSTF-425. As part of their review, the Nuclear Regulatory Commission staff has requested additional information (Reference 2). Responses to the requested additional information are provided in Attachment (1).

This additional information does not change the No Significant Hazards Determination provided in Reference 1. No regulatory commitments are contained in this letter.

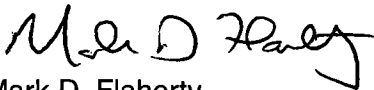
Should you have questions regarding this matter, please contact Mr. Larry D. Smith at (410) 495-5219.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on May 1, 2015.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark D. Flaherty", written in a cursive style.

Mark D. Flaherty
Plant Manager

MDF/PSF/bjm

Attachment: (1) Request for Additional Information Regarding TSTF-425

cc: NRC Project Manager, Calvert Cliffs
NRC Regional Administrator, Region I

NRC Resident Inspector, Calvert Cliffs
S. Gray, MD-DNR

ATTACHMENT (1)

REQUEST FOR ADDITIONAL INFORMATION REGARDING TSTF-425

ATTACHMENT 1

REQUEST FOR ADDITIONAL INFORMATION REGARDING TSTF-425

By letter dated April 14, 2015, the Nuclear Regulatory Commission staff requested the following information to complete their review.

RAI-1:

Step 8 of Section 4.0 of NEI 04-10, Revision 1 states, in part, that:

The risk impact of a proposed [Surveillance Test Interval (STI)] adjustment shall be calculated as a change of the test-limited risk (see Regulatory Guide 1.177, Section 2.3.3^(j)). Since the test-limited risk is associated with failures occurring between tests, the failure rate that shall be used in calculating the risk impact of a proposed STI adjustment is the time-related failure rate associated with failures occurring while the component is in standby between tests (i.e., risk associated with the longer time to detect standby-stress failures).

Describe how the Calvert Cliffs Surveillance Frequency Control Program will address the standby (i.e., the time-related) contribution for extended surveillances.

CCNPP RESPONSE TO RAI-1:

The standby time related failures will be assessed in accordance with NEI 04-10, Revision 1 by direct change in the test interval for those structures, systems, and components (SSCs) that include a standby periodically tested failure mode in the Calvert Cliffs probabilistic risk assessment (PRA) models along with the appropriate adjustments to common cause failure events. Where there is no standby periodically tested event in the PRA models and one is not added or the failure cannot be divided into time based and non-time based contributions, as allowed by Regulatory Guide 1.177 all contributors to the failure rate will be assumed to be time based and the values adjusted accordingly.

If the SSCs do not appear explicitly in the PRA models, either a bounding assessment using a surrogate event or a qualitative assessment will be performed in accordance with the NEI 04-10, Revision 1, guidance.

RAI-2:

Attachment 2 of the LAR states that Calvert Cliffs does not have a low power or shutdown probabilistic risk assessment model. A qualitative analysis of shutdown events is acceptable, as presented in the NRG-endorsed document NEI 04-10, Revision 1. Step 10 of Section 4.0 of NEI 04-10, Revision 1 provides guidance on the initial assessment of Internal Events, External Events, and Shutdown Events. Describe how shutdown events will be assessed as part of the Calvert Cliffs Surveillance Frequency Control Program.

CCNPP RESPONSE TO RAI-2:

While Calvert Cliffs does not have a low power or shutdown PRA model, the Surveillance Frequency Control Program will assess shutdown events qualitatively per NEI 04-10, Revision 1 guidance as incorporated in Exelon procedures.