



Exelon Generation®

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10 CFR 50.90  
10 CFR 50, Appendix E  
10 CFR 50.4

NMP1L3199

January 31, 2018

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

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

Calvert Cliffs Independent Spent Fuel Storage Installation  
Materials License No. SNM-2505  
NRC Docket No. 72-8

Nine Mile Point Nuclear Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
NRC Docket Nos. 50-220, 50-410, and 72-1036

R. E. Ginna Nuclear Power Plant  
Renewed Facility Operating License No. DPR-18  
NRC Docket Nos. 50-244 and 72-67

Subject: Response to Request for Additional Information  
License Amendment Request to Adopt Emergency Action Level Schemes  
Pursuant to NEI 99-01, Revision 6, "*Development of Emergency Action Levels  
for Non-Passive Reactors*"

- References:
- 1) Letter from David T. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission) - License Amendment Request to Adopt Emergency Action Level Schemes Pursuant to NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," dated May 31, 2017 (ML17164A149)
  - 2) Electronic Mail Request from Blake Purnell (U.S. Nuclear Regulatory Commission) to Richard Gropp, et al. (Exelon Generation Company, LLC) - Calvert Cliffs, Ginna, and Nine Mile Point - Draft Request for Additional Information for EAL Scheme Change Amendments, dated November 27, 2017

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- 3) Letter from Blake Purnell (U.S. Nuclear Regulatory Commission) to Bryan C. Hanson (Exelon Generation Company, LLC) – Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Calvert Cliffs Independent Spent Fuel Storage Installation; Nine Mile Point Nuclear Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant - Request for Additional Information Regarding License Amendment Request to Revise Emergency Action Level Schemes, dated December 12, 2017 (ML17331B134)

By letter dated May 31, 2017 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a License Amendment Request (LAR) to support changes to the Emergency Plans for the cited facilities. Specifically, the proposed changes involve revising the Emergency Plans for the affected facilities to adopt the Nuclear Energy Institute's (NEI's) revised Emergency Action Level (EAL) schemes described in NEI 99-01, Revision 6, *"Development of Emergency Action Levels for Non-Passive Reactors,"* which have been endorsed by the NRC as documented in an NRC letter dated March 28, 2013 (ML2346A463).

10 CFR 50, Appendix E, Section IV.B.2 stipulates that a licensee desiring to change its entire EAL scheme shall submit an application for an amendment to its license and receive NRC approval before implementing the change. The currently approved Emergency Plan EAL schemes for the cited facilities are based on the guidance established in NEI 99-01, Revision 5, *"Methodology for Development of Emergency Action Levels."* Exelon is proposing to adopt the EAL schemes based on the latest NRC-endorsed guidance, which is described in NEI 99-01, Revision 6.

In a U.S. Nuclear Regulatory Commission (NRC) electronic mail message dated November 27, 2017 (Reference 2), the NRC indicated that it had reviewed the information submitted in the Reference 1 letter pertaining to the proposed LAR and requested additional clarifying information to support its continued review. The Reference 2 electronic mail request contained a number of NRC questions, which were further discussed during a December 6, 2017, teleconference between Exelon and NRC representatives. Subsequently, by letter dated December 12, 2017 (Reference 3), the NRC formally issued its Request for Additional Information (RAI) related to the amendment request and requested a response by January 31, 2018.

Accordingly, Attachment 1 provides Exelon's response to the request for information contained in the Reference 3 letter. Attachment 1 also includes additional information supporting minor clarifying changes for other EALs as a result of the discussions with the NRC. Attachments 2 through 4 include revised clean pages for the affected EAL Basis documents and other supporting information for the plants listed.

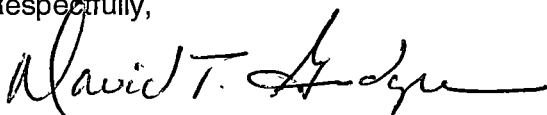
Exelon has reviewed the information supporting a finding of No Significant Hazards Consideration and the Environmental Consideration provided to the NRC in the Reference 1 submittal. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. Furthermore, the additional information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments contained in this submittal.

If you have any questions concerning this submittal, please contact Richard Gropp at (610) 765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31st day of January 2018.

Respectfully,



David T. Gudger  
Manager, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

Attachments:

- Attachment 1 - Response to the Request for Additional Information - License Amendment Request to Adopt Emergency Action Level Schemes Pursuant to NEI 99-01, Revision 6, *"Development of Emergency Action Levels for Non-Passive Reactors"*
- Attachment 2 - Revised Radiological Emergency Plan Annex Information for Calvert Cliffs Nuclear Power Station
- Enclosure 2A – Revised EAL Comparison Matrix Document Pages
  - Enclosure 2C – Revised EAL Basis Document Pages
- Attachment 3 - Revised Radiological Emergency Plan Annex Information for Nine Mile Point Nuclear Station
- Enclosure 4A – Revised EAL Comparison Matrix Document Pages (Unit 1)
  - Enclosure 4C – Revised EAL Basis Document Pages (Unit 1)
  - Enclosure 5A – Revised EAL Comparison Matrix Document Pages (Unit 2)
  - Enclosure 5C – Revised EAL Basis Document Pages (Unit 2)
- Attachment 4 - Revised Radiological Emergency Plan Annex Information for R.E. Ginna Nuclear Power Plant
- Enclosure 3A – Revised EAL Comparison Matrix Document Pages
  - Enclosure 3C – Revised EAL Basis Document Pages

cc: w/ Attachments

Regional Administrator – NRC Region I  
NRC Senior Resident Inspector – Calvert Cliffs Nuclear Power Station  
NRC Senior Resident Inspector – Nine Mile Point Nuclear Station  
NRC Senior Resident Inspector – R.E. Ginna Nuclear Power Station  
NRC Project Manager, NRR – Exelon Fleet  
NRC Project Manager, NRR – Calvert Cliffs Nuclear Power Station  
NRC Project Manager, NRR – Nine Mile Point Nuclear Station  
NRC Project Manager, NRR – R.E. Ginna Nuclear Power Station  
S. Gray, State of Maryland  
A. L. Peterson, NYSERDA