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JOSEPH A. TIERNAN
VICE PRESIDENT
NUCLEAR ENERGY

March 27, 1986

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Mr. Harold R. Denton, Director

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 and 2; Docket Nos. 50-317 & 50-318
Reduction of the Emergency Planning Zone

- REFERENCES: (a) Letter from J. A. Tiernan, (BG&E), to E. J. Butcher, Jr., (NRC),
Request for Exemption, dated November 18, 1985
- (b) Letter from J. A. Tiernan, (BG&E), to Mr. A. C. Thadani, (NRC),
Request for License Amendment, dated January 10, 1986

Gentlemen:

Thank you for your letter dated February 14, 1986, responding to our application for reducing the size of the Calvert Cliffs plume exposure emergency planning zone. We concur that it is reasonable to defer a review of our application until public comments have been resolved on those portions of NUREG-0956 referenced in our analysis. In this regard, we would be pleased to meet at your convenience to discuss your schedule for commencing a review.

In your letter you characterized the staff's ongoing efforts with the IDCOR group and a newly-established interface with the Atomic Industrial Forum (AIF) as activities which are expected to provide additional inputs to a review. Whereas we commend the staff for engaging in these important activities, we do not feel that they pertain directly to our application. As you know, we are a member of IDCOR and AIF and have been an active participant in both of the activities to which you refer. The objectives of these activities are to develop a generic methodology for implementation of the NRC's severe accident policy and to determine how updated source terms can be incorporated into regulatory practice through generic rulemaking and revisions to regulatory guidance.

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In contrast, our application involves a plant-specific request for exemption from an existing rule, justified by a showing that the underlying purpose of that rule would continue to be served if the exemption were to be granted. No changes would be required to the subject rule (10 CFR 50.47), to the basis for this rule (NUREG-0396), or to any associated regulatory guidance. Thus, we believe that our request should be held separate and distinct from any longer-term, generic activities.

If you should have any questions, please do not hesitate to contact us.

Very truly yours,

Stiermar

JAT/BSM/dmk

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
T. Magette, DNR
D. H. Jaffe, NRC
T. Foley, NRC