



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 16, 1997

MEMORANDUM TO: David B. Matthews, Chief  
Generic Issues and Environmental  
Projects Branch  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

FROM: Claudia M. Craig, Senior Project Manager *Claudia M. Craig*  
Generic Issues and Environmental  
Projects Branch  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF SENIOR MANAGEMENT MEETING WITH BALTIMORE GAS &  
ELECTRIC (BGE) TO DISCUSS LICENSE RENEWAL ENVIRONMENTAL REPORT  
(ER) TEMPLATE PROCESS

The subject meeting was held at the Nuclear Regulatory Commission (NRC) offices in Rockville, Maryland on June 5, 1997, between staff and management representatives of BGE and the NRC. Attachment 1 is a list of meeting participants. Attachment 2 is a copy of the BGE and staff presentation material.

Existing NRC guidance is currently being updated to reflect the revised 10 CFR Part 51, which includes the environmental requirements of a license renewal application. BGE anticipates completing their ER prior to final guidance being issued by the Commission. Thus, in the absence of final staff guidance, BGE proposed the ER template process to develop a format and content guide such that BGE could develop an ER that would likely be accepted for staff review. The meeting was held to discuss the culmination of work performed by BGE and the NRC staff.

BGE's presentation consisted of an overview of the ER template process, including a timeline of activities. The timeline outlined the BGE/NRC meetings and what was accomplished at each meeting. BGE also briefly discussed the technical issues that BGE requested further clarification on during the template process: Severe Accident Mitigation Alternatives (SAMAs), transportation, electric shock, and the "NA" issues. BGE stated that as a result of the template efforts in both the technical and environmental areas, it believes it has adequate guidance to complete a license renewal application, should the board of directors decide to move forward with license renewal.

The staff presentation consisted of an overview of the review conducted by the staff on the template and examples. The staff discussed the areas that prompted the most discussion with BGE and provided the staff opinion on resolution of those items. The issues included: new and significant information/Category 1 issues, mitigative measures, high level waste

transportation, electric shock, alternatives, SAMAs, and environmental justice. A number of these issues are unique to the revised 10 CFR Part 51 and further guidance on staff expectations was needed. The staff and BG&E had previously discussed these issues and the staff opinion at the May 19, 1997 meeting. As a result of the template and example reviews, the staff concluded that should BGE submit a license renewal application with an environmental report that follows the template outline with the level of detail contained in the examples, it is likely the ER would be accepted for staff review. The staff stated that the template process was very helpful, both in identifying how the rule was being implemented by licensees and developing staff guidance. The staff also provided a schedule of upcoming environmental activities and provided a schedule for the release of guidance documents for comment.

BGE concluded their presentation by providing a tentative 1997 schedule for BGE technical report activities for license renewal. Although no decision on license renewal has been made, BGE stated that it feels license renewal is a viable option for Calvert Cliffs and they will continue to discuss the license renewal option with their various stakeholders.

Docket Nos. 50-317, 50-318

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Attachments: As stated

June 16, 1997

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BGE / NRC MEETING  
ENVIRONMENTAL REPORT TEMPLATE PROCESS

JUNE 5, 1997

MEETING PARTICIPANTS

<u>NAME</u>	<u>ORGANIZATION</u>
Claudia Craig	NRC/NRR/PGE
Barth W. Doroshuk	BGE
R. E. Denton	BGE
C.H. Cruse	BGE
P.G. Chabot	BGE
David Lewis	Shaw Pittman
James Bennett	BGE
Robert Tucker	BGE
Jim Lippold	BGE
Scott Flanders	NRC/NRR/PDLR
Alexander W. Dromerick	NRC/NRR/PD I-1
Scott Stewart	NRC
Ralph Architzel	NRC/NRR
Tricia Heroux	for EPRI
Bob Borsum	B&WOG
Rich McLean	State of Maryland
Don Cleary	NRC/RES
Catherine Marco	NRC/OGC
Eugene Holler	NRC/OGC
Janice Moore	NRC/OGC
David Matthews	NRC/NRR/PGE
Sam Collins	NRC/NRR
Marylee Slosson	NRC/NRR/DRPM
Jim Wilson	NRC/NRR/PGE
Steve Mixon	NUS Licensing Information Services
Chris Grimes	NRC/NRR/PDLR

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DMatthews

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JMoore, OGC

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# **License Renewal Discussions with U.S. Nuclear Regulatory Commission**

**June 5, 1997**

**Barth W. Doroshuk  
Principal Engineer**



## Presentation Objectives

- Review objectives of ER template initiative
- Discuss BGE/NRC activities to accomplish initiative
- BGE observations of effort
- BGE 1997 schedule of activities





## 10CFR Part 51

### Proposed Environmental Report Initiative

January 9, 1997

- BGE proposed that an ER "template" activity be initiated with USNRC to assure USNRC expectations were clear.
- In addition, BGE proposed that several technical issues, required to be evaluated for license renewal, be discussed to clarify scope:
  - SAMDA
  - Electric Shock
  - Transportation
  - "NA" issues (EMF, Environmental Justice)





## Objectives of BGE/NRC Environmental Template Effort

Achieve agreement between NRC and BGE on format and content of an ER so that, should BGE submit LRA, NRC would find ER Section sufficient to begin review.



## BGE and NRC Technical Exchanges

February 1997: BGE and NRC meet to discuss efforts objectives. BGE submits proposed template and four issue papers for staff review.

March 1997: NRC provides BGE with comments and questions on template and issue papers

- No major template changes

Several issues identified requiring BGE/NRC action:

- GEIS / Rule inconsistencies
- Adoption of GEIS Category 1 conclusions
- Transportation issue
- New and significant information
- Mitigating measures for Category 2 issues with small or negligible impact



## BGE and NRC Technical Exchanges

April 1997:

BGE delivers responses to NRC comments on template/issue papers. BGE submits revised template and example sections of ER:

- Groundwater use conflicts
- Transportation - Table S-4 only
- Impingement
- One alternative energy source analysis — coal-fired plant

NRC agrees to review issues and examples.



## BGE and NRC Technical Exchanges

May 1997:

BGE and NRC meet to discuss NRC final comments on examples and issues. Appears that:

- ER template found adequate
- Examples provided adequate information for staff review
- All issues, except transportation, resolved

BGE and NRC question if any portions of ER can be reviewed technically prior to formal submittal of LRAs.



## **BGE Observations** **of ER Template Initiative**

- BGE continues to believe that these initiatives contribute greatly to the stability of the License Renewal process
- BGE believes it now has adequate guidance to complete the License Renewal applications for Calvert Cliffs - both technically and environmentally
- BGE appreciates NRC allocating resources to continue this work



## **BGE 1997 Schedule of Activities**

- Complete ER by end of June; begin formal site review/approval process (SAMA completed in September)
- Complete balance of Integrated Plant Assessment required by 10CFR54 by August; complete formal site/approval process by September
- Continue to submit reports, when ready, unless decision is made to submit formal application



*Rough, Ballpark LRTR Milestone Dates (changes are bolded)*

	Technical Report	start of LCMU review	Provided to NRM	POSRC meeting	OSSRC subcommittee
1	Feedwater	✓	✓	✓	✓
2	Diesel Fuel Oil	✓	✓	✓	✓
3	Radiation Monitoring	✓	✓	✓	✓
4	Reactor Vessel Internals	✓	✓	✓	✓
5	Component Supports	✓	✓	<b>6/18</b>	<b>6/26</b>
6	Compressed Air	✓	✓	<b>6/18</b>	<b>6/26</b>
7	Component Cooling	✓	✓	<b>6/18</b>	<b>6/26</b>
8	Reactor Vessel/CEDMs	✓	✓	<b>6/23</b>	<b>6/26</b>
9	EQ	✓	<b>6/6</b>	<b>6/23</b>	<b>6/26</b>
10	Spent Fuel Pool Cooling	✓	<b>6/10</b>	<b>7/2</b>	<b>7/31</b>
11	Service Water	✓	<b>6/20</b>	<b>7/9</b>	<b>7/31</b>
12	Cables	✓	<b>6/11</b>	<b>7/2</b>	<b>7/31</b>
13	CVCS	✓	<b>6/13</b>	<b>7/7</b>	<b>7/31</b>
14	Fire Protection	<b>6/6</b>	<b>6/20</b>	<b>7/9</b>	<b>7/31</b>
15	Containment Isolation	<b>6/9</b>	<b>6/23</b>	<b>7/14</b>	<b>7/31</b>
16	Main Steam	<b>6/11</b>	<b>6/25</b>	<b>7/16</b>	<b>7/31</b>
17	Auxiliary Feedwater	<b>6/13</b>	<b>6/30</b>	<b>7/21</b>	<b>8/28</b>
18	Cranes & Fuel Handling	<b>6/18</b>	<b>7/2</b>	<b>7/23</b>	<b>8/28</b>
19	NSSS Sampling	<b>6/30</b>	<b>7/14</b>	<b>8/4</b>	<b>8/28</b>
20	Structures	<b>7/2</b>	<b>7/16</b>	<b>8/6</b>	<b>8/28</b>
21	Saltwater	<b>7/7</b>	<b>7/21</b>	<b>8/11</b>	<b>8/28</b>
22	Electrical Panels	<b>7/9</b>	<b>7/23</b>	<b>8/13</b>	<b>8/28</b>
23	HVAC	<b>7/14</b>	<b>7/28</b>	<b>8/18</b>	<b>8/28</b>
24	Emergency Diesels	<b>7/23</b>	<b>8/6</b>	<b>8/27</b>	<b>9/25</b>
25	Instrument Lines	<b>7/30</b>	<b>8/13</b>	<b>9/3</b>	<b>9/25</b>
26	Containment Spray	<b>8/4</b>	<b>8/18</b>	<b>9/8</b>	<b>9/25</b>
27	Safety Injection	<b>8/6</b>	<b>8/20</b>	<b>9/10</b>	<b>9/25</b>
28	Reactor Coolant System	<b>8/13</b>	<b>8/27</b>	<b>9/17</b>	<b>9/25</b>
29	TLAA				





*United States*  
*Nuclear Regulatory Commission*

**BGE ENVIRONMENTAL REPORT TEMPLATE  
FOR LICENSE RENEWAL**

**June 5, 1997**

**Claudia M. Craig**

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# BGE ENVIRONMENTAL REPORT TEMPLATE REVIEW

- Purpose: Establish format and content for ER such that it would be acceptable for review
- Reviewed template to ensure rule requirements met
- Reviewed examples to determine level of detail for ER
- Identified a number of areas where NRC/industry dialogue was needed
  - New and significant information/Category 1
  - Mitigation measures
  - High level waste transportation
  - Electric shock hazard
  - Alternatives
  - Severe Accident Mitigation Alternatives (SAMAs)
  - Environmental Justice

## **BGE ENVIRONMENTAL REPORT TEMPLATE REVIEW (Continued)**

- High level waste transportation issue unresolved; staff generic analysis identified as resolution path
- Based on template and examples, appears BGE ER would likely be accepted for review
- Template process helpful
- Template provided first look at revised Part 51 implementation
- Identified inconsistencies between rule and GEIS; subject to future rule changes

## **OTHER LICENSE RENEWAL ENVIRONMENTAL ACTIVITIES**

- Commission meeting June 12 - status of license renewal activities, including environmental activities
- Draft ESRP to be released for public comment 8/97
- Draft RG to be released for public comment 7/97
- Encourage industry involvement during comment period
- Continuing to address issues through guidance development

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