

10 CFR 50.4
10 CFR 50.54(q)(5)
10 CFR 72.44(f)

RS-22-068

May 19, 2022

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Constellation Radiological Emergency Plan Addendum Revision

In accordance with 10 CFR 50.4(b)(5), "*Emergency Plan and related submissions*," Constellation Energy Generation, LLC (CEG) is submitting the Emergency Plan Addendum revisions listed in the table below for Clinton Power Station (Clinton).

Document	Revisions	Title
EP-AA-1003, Addendum 3	7	<i>Emergency Action Levels for Clinton Station</i>

The changes to the Emergency Plan Addendum cited in the table were evaluated under the requirements of 10 CFR 50.54(q) and were determined not to result in a reduction in the effectiveness of the Emergency Plan for Clinton. This notification is being submitted within 30 days of implementation of the changes as required by 10 CFR 50.54(q)(5). The changes continue to meet the applicable emergency planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

In addition, as required by 10 CFR 50.54(q)(5), Attachment 1 of this submittal includes a summary analysis of the changes to the Emergency Plan Addendum. This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the Emergency Plan, the licensee shall submit a report containing a description of the changes to the Director, Division of Fuel Management, Office of Nuclear Material Safety and Safeguards.


A copy of the Emergency Plan Addendum revision and supporting change summary analysis are included in the attachments to this letter.

There are no regulatory commitments in this submittal.

If you have any questions or require additional information, please contact Amy Hambly at (630) 657-2808.

Respectfully,

**Gullott,
David M.**

 Digitally signed by
Gullott, David M.
Date: 2022.05.19 09:33:45
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David M. Gullott
Director, Licensing
Constellation Energy Generation, LLC

Attachments: 1) 10 CFR 50.54(q)(5) Procedure Change Summary Analysis
2) EP-AA-1003, Addendum 3, Revision 7, *"Emergency Action Levels for Clinton Station"*

cc: w/ Attachment 1 only
Regional Administrator - NRC Region III
Director, NRC Division of Spent Fuel Management, ONMSS
NRC Senior Resident Inspector – Clinton Station
NRC Project Manager, NRR – Clinton Station

Attachment 1

10 CFR 50.54(q)(5) Procedure Change Summary Analysis

I. Procedures/Titles

Constellation Energy Generation, LLC (CEG) is submitting the following Emergency Plan Addendum revision for the Clinton Power Station (Clinton):

- EP-AA-1003, Addendum 3, Revision 7, *“Emergency Action Levels for Clinton Station”*

II. Description of Procedures

Emergency Action Levels for Clinton Station

III. Description of Changes

This 50.54(q) is being performed for the following reasons:

- 1) To enhance HU3 Basis on when a new EAL clock should begin.

On October 16, 2021, Dresden Station declared an Unusual Event for a fire in a Main Power Transformer lasting greater than 60 minutes in the site’s Protected Area. As part of this event a review was performed to determine learnings and possible enhancements to assist decision makers in future similar events (IR 04454286 EP Critique/Lessons Learned from Unusual Event Declaration). This review determined that an enhancement to HU3 Basis, discussing when a new fire time clock would be applicable, would assist decision makers during events like the Dresden Transformer Fire.

It was determined that the following sentence would be added to the beginning of the HU3 Basis section.

“When it is determined a FIRE is extinguished, then any subsequent FIRE starts a new time clock.”

The change differs in wording but agrees in meaning and intent of HU3 Basis, such that classification of the event would be the same. As such, the proposed changes would reasonably be considered a difference as provided by the guidance in RIS-2003-18, Supplement 2.

“A difference is an EAL change where the basis scheme guidance differs in wording but agrees in meaning and intent, such that classification of an event would be the same, whether using the basis scheme guidance or the site-specific proposed EAL. Examples of differences include the use of site-specific terminology or administrative re-formatting of site-specific EALs.”

Description of How the Change Still Complies with Regulations

Adding the following sentence to the beginning of the HU3 Basis section.

“When it is determined a FIRE is extinguished, then any subsequent FIRE starts a new time clock.”

The change differs in wording but agrees in meaning and intent of HU3 Basis, such that classification of the event would be the same. As such, the proposed changes would reasonably be considered a difference as provided by the guidance in RIS-2003-18, Supplement 2.

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The change agrees in meaning and intent of the applicable EALs such that classification and timeliness of the event would be the same. Therefore, this change would not result in a reduction of effectiveness of the Emergency Plan. Additionally, the regulations and commitments to the NRC continue to be met.

Description of Why the Change is Not a Reduction in Effectiveness (RIE)

The change differs in wording but agrees in meaning and intent of HU3 Basis, such that classification of the event would be the same. As such, the proposed changes would reasonably be considered a difference as provided by the guidance in RIS-2003-18, Supplement 2.

“A difference is an EAL change where the basis scheme guidance differs in wording but agrees in meaning and intent, such that classification of an event would be the same, whether using the basis scheme guidance or the site-specific proposed EAL. Examples of differences include the use of site-specific terminology or administrative re-formatting of site-specific EALs.”

The change agrees in meaning and intent of the applicable EALs such that classification and timeliness of the event would be the same. Therefore, this change would not result in a reduction of effectiveness of the Emergency Plan. Additionally, the regulations and commitments to the NRC continue to be met.