



**Constellation
Generation Group, LLC**

*A Member of the
Constellation Energy Group*

March 4, 2003

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Nine Mile Point Nuclear Station
Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410
Detailed Comments to Design Basis Threat

REFERENCES: (a) Letter from Mr. R. P. Zimmerman (NRC) to Mr. E. P. Gwiazdowski (CCNPP), dated January 2, 2003, "Staff View of Adversary Attributes for Radiological Sabotage"
(b) Letter from Mr. T. N. Pritchett (CGG) to Mr. R. A. Meserve (NRC), dated January 31, 2003, "Initial Comments to Design Basis Threat"

Constellation Generation Group, LLC, on behalf of licensees Calvert Cliffs Nuclear Power Plant, Inc. and Nine Mile Point Nuclear Station, LLC, hereby submits detailed comments in response to Reference (a). These detailed comments, provided as an enclosure to this letter contain Safeguards Information as described in 10 CFR 73.21. Constellation Generation Group, LLC, therefore, requests that the enclosure be withheld from public disclosure.

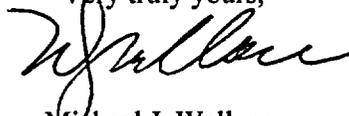
Constellation Generation Group, LLC personnel have reviewed the Nuclear Regulatory Commission's draft paper, enclosure to Reference (a), entitled "Staff View of Adversary Attributes for Radiological Sabotage," which describes what the Commission is considering for a revised design basis threat. We provided our initial comments in Reference (b). The enclosure to this letter provides our second set of comments, which are more detailed comments, addressing what we consider to be the significant policy issues discussed in Reference (a). During a January 9, 2003 meeting, the Nuclear Regulatory Commission staff requested participants to consider answering four specific questions when commenting on the proposed attributes described in Reference (a). The enclosure to this letter provides Constellation Generation Group's response to the four specific questions that the Nuclear Regulatory Commission staff requested input on.

The enclosure to this letter contains "Safeguards Information." Upon separation of the enclosure, this cover letter is to be considered DECONTROLLED.

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Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



Michael J. Wallace
President – Constellation Generation Group, LLC

MJW/ALS

Enclosure: Constellation Generation Group, LLC, Calvert Cliffs Nuclear Power Plant, Inc., Nine Mile Point Nuclear Station, LLC -- Detailed Comments Regarding Design Basis Threat (Safeguards Information)

cc: R. P. Zimmerman, NRC (With Enclosure)

cc: (Without Enclosure)

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NRC 03-020

COMMITMENTS IDENTIFIED IN THIS CORRESPONDENCE:

- None