

Michael J. Wallace
President, Constellation Generation Group

750 E. Pratt Street
18th Floor
Baltimore, Maryland 21202-3106
410 783-2877
410 783-2873 Fax
mjlw@constellation.com



June 2, 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
Response to Issuance of Orders to Modify License for Revised Design Basis
Threat and Compensatory Measures Related to Security Force Training and
Fitness-for-Duty

On April 29, 2003, the NRC issued the three subject Orders requiring additional compensatory measures as prudent measures to address the current security threat environment. Pursuant to the requirements of 10 CFR 50.4, Constellation Generation Group, LLC (CGG), on behalf of its licensees Calvert Cliffs Nuclear Power Plant, Inc. (Calvert Cliffs) and Nine Mile Point Nuclear Station, LLC (Nine Mile Point), hereby submits its Response to the subject Orders. This letter does not contain any Safeguards Information as defined in 10 CFR 73.2

In response to the events of September 11, 2001, Calvert Cliffs and Nine Mile Point, on their own and in response to Nuclear Regulatory Commission (NRC or Commission) Advisories, Orders, and industry initiatives, promptly initiated and maintained heightened security measures to continue to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety in the current threat environment.

Calvert Cliffs and Nine Mile Point both fully intend to comply with the Orders. However, CGG notes the request for clarification of the five design basis threat (DBT) issues provided in the safeguards attachment to Reference (a) and encourages the Commission to respond to this request as soon as possible as the Commission's clarifications may affect the manner of its compliance with the Orders.

Pursuant to the requirements of 10 CFR 2.202(a)(2), a document relating to the answers to the Orders is being transmitted to the Secretary of the Commission under separate cover (Reference b). In addition, CGG has submitted a letter to the Director, Office of Nuclear Reactor Regulation requesting an extension of time in which to submit an answer and an extension of time to request a hearing for one of the orders and for certain relief regarding the two other orders (Reference c). As required by Condition III.A.1 of the DBT Order (Reference d), CGG will, subject to the relief requested in the form of clarifications in

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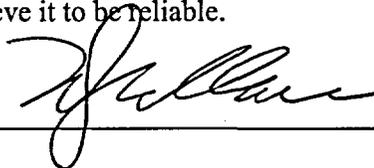
Reference (c), submit to the Commission for review and approval no later than April 29, 2004, the revised physical security plans, safeguards contingency plans and guard training and qualification plans, including an implementation schedule, which will describe how the facilities will respond to the DBT contained in Attachment (2) to the Order. Conditions III.C.1 of the Training Order (Reference e) and of the Fatigue Order (Reference f) require that "[a]ll licensees shall within thirty-five (35) days of the date of this Order, submit to the Commission a schedule for achieving compliance with each requirement described in Attachment 2." Subject to the relief requested in the form of clarifications in Reference (c), CGG will achieve compliance with the requirements described in Attachment (2) of the Training Order (Reference e) no later than October 29, 2004 and no later than the October 29, 2003 for the requirements described in Attachment (2) of the Fatigue Order (Reference f). As required by Condition III.C of the DBT Order (Reference d) and Condition III.C.2 of the other two Orders (References e and f), CGG will notify the Commission when full compliance with each order has been achieved.

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

Very truly yours,

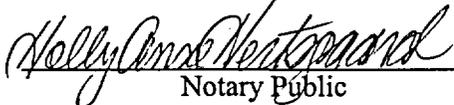
STATE OF MARYLAND :
: TO WIT:
COUNTY OF ANNE ARUNDEL :

I, Michael J. Wallace, being duly sworn, state that I am President and Chief Nuclear Officer, Constellation Generation Group, LLC, and that I am duly authorized to execute and file this response on behalf of Calvert Cliffs Nuclear Power Plant, Inc. and Nine Mile Point Nuclear Station, LLC. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other Calvert Cliffs and Nine Mile Point employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.



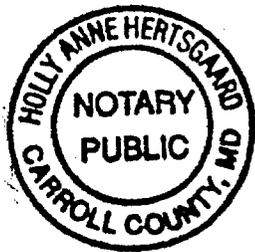
Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of CARROLL, this 2nd day of JUNE, 2003.

WITNESS my Hand and Notarial Seal:



Notary Public

My Commission Expires:



2-15-04

Date

MJW/ALS/bjd

REFERENCES:

- (a) Letter from Mr. J. F. Colvin (NEI) to Chairman Nils J. Diaz (NRC), dated May 16, 2003
- (b) Letter from Mr. M. J. Wallace (CGG) to Mr. S. J. Collins (NRC), dated June 2, 2003, Relief and Understandings Relating to Commission Orders EA-038, EA-039, and EA-03-086
- (c) Correspondence from Mr. M. J. Wallace (CGG) to Office of the Secretary (NRC), dated June 2, 2003, Answer to Commission Orders EA-03-038, EA-03-039, and EA-03-086
- (d) Letter from Mr. S. J. Collins (NRC) to Holders of Licenses for Operating Power Reactors, dated April 29, 2003, Issuance of Order Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors, EA-03-086
- (e) Letter from Mr. S. J. Collins (NRC) to Holders of Licenses for Operating Power Reactors, dated April 29, 2003, Issuance of Order for Compensatory Measures Related to Training Enhancements on Tactical and Firearms Proficiency and Physical Fitness Applicable to Armed Nuclear Power Plant Security Force Personnel, EA-03-039
- (f) Letter from Mr. S. J. Collins (NRC) to Holders of Licenses for Operating Power Reactors, dated April 29, 2003, Issuance of Order for Compensatory Measures Related to Fitness-for-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel, EA-03-038

cc: J. Petro, Esquire
J. E. Silberg, Esquire
Director, Project Directorate I-1, NRC
D. M. Skay, NRC
G. S. Vissing, NRC
P. S. Tam, NRC
H. J. Miller, NRC
Resident Inspector, NRC, CCNPP

Resident Inspector, NRC, NMP
R. I. McLean, DNR
Rulemakings and Adjudications Staff, NRC
S. J. Collins, NRC
Assistant General Counsel for Materials
Litigation and Enforcement, NRC