

**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



July 24, 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  
Supplemental Response to Issuance of Order to Modify License and Compensatory Measures Related to Security Force Fitness-For-Duty (EA-03-038)

Constellation Generation Group, LLC, (CGG) on behalf of licensees Calvert Cliffs Nuclear Power Plant, Inc. and Nine Mile Point Nuclear Station, LLC, hereby submits its supplemental response to Nuclear Regulatory Commission (NRC) Order EA-03-038 (Reference a) (hereinafter, the Order). By letter dated June 2, 2003 (Reference b), CGG provided its response to the Order, pursuant to the requirements of 10 CFR 50.4. A related relief request (Reference c) was also submitted on that date. By letter dated July 10, 2003 (Reference d), the NRC responded to our June 2, 2003 letter (Reference c), requiring a response to the Order. Pursuant to the requirements of 10 CFR 50.4, and as required by Reference (d), this letter supplements Reference (b). As discussed previously in Reference (b), CGG reiterates that it fully intends to comply with the Order.

Pursuant to Section III.A of the Order, CGG immediately began implementation of the requirements in Attachment 2 to the Order and will be in full compliance by October 29, 2003.

IES3

Pursuant to Section III.C.1 of the Order, CGG hereby submits its schedule for achieving full compliance with each requirement described in Attachment 2 of the Order. Specifically, CGG will achieve full compliance with each requirement described in Attachment 2 of the Order no later than October 29, 2003.

Pursuant to the requirements of 10 C.F.R. § 2.202(a)(2), an Answer is being transmitted to the Secretary of the Commission under separate cover. In addition, pursuant to Section III of the Order, a letter to the Director, Office of Nuclear Reactor Regulation requesting relief related to two items is being separately submitted. Those two items are: (1) an interpretation contained in the July 10, 2003, letter involving the accounting of turnover time in the group work-hour provisions of the Order; and (2) a relaxation of the group work-hour controls during preparation for and conduct of certain force-on-force exercises.

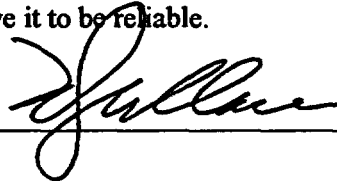
Constellation Generation Group, LLC, intends to fully comply with the Order and at this time, knows of no matters about which the Commission must be notified pursuant to Section III.B.1 or B.2 of the Order. Constellation Generation Group, LLC, will promptly notify the Commission if any such matters arise in the course of further implementation of the Order.

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

Very truly yours,

STATE OF NEW YORK :  
COUNTY OF OSWEGO : TO WIT:  
:

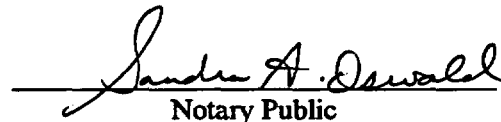
I, Michael J. Wallace, being duly sworn, state that I am President and Chief Nuclear Officer, Constellation Generation Group, LLC, and that I am duly authorized to execute and file this response on behalf of Calvert Cliffs Nuclear Power Plant, Inc. and Nine Mile Point Nuclear Station, LLC. To the best 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 New York and County of Oswego, this 24<sup>th</sup> day of July, 2003.

WITNESS my Hand and Notarial Seal:

SANDRA A. OSWALD  
Notary Public, State of New York  
No. 01OS6032276  
Qualified in Oswego County  
Commission Expires 10/25/05  
My Commission Expires:

  
Notary Public

7/24/03  
Date

MJW/ALS/bjd

**REFERENCES:**

- (a) 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
- (b) Letter from Mr. M. J. Wallace (CGG) to Document Control Desk (NRC), dated June 2, 2003, 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
- (c) Letter from Mr. M. J. Wallace (CGG) to Mr. S. J. Collins (NRC), dated June 2, 2003, Relief and Understandings Relating to Orders to Modify License for Revised Design Basis Threat and Compensatory Measures, Related to Security Force Training and Fitness-for-Duty
- (d) Letter from Mr. S. J. Collins (NRC) to Mr. M. J. Wallace (CGG), dated July 10, 2003, Relaxation of the Order, Exercising Enforcement Discretion, and Extension of the Time to Submit an Answer or Request a Hearing Regarding Order EA-03-038, Fitness-For-Duty Enhancements for Nuclear Security Force Personnel, for: Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, Nine Mile Point Nuclear Station, Unit Nos. 1 and 2

cc: J. Petro, Esquire  
M. J. Wetterhahn, Esquire  
Director, Project Directorate I-1, NRC  
D. M. Skay, NRC  
G. S. Vissing, NRC  
P. S. Tam, NRC  
H. J. Miller, NRC  
Sr. 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