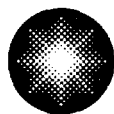


SAFEGUARDS INFORMATION

George Vanderheyden
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Constellation Energy

May 31, 2005

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

Response to NRC Guidance Regarding Mitigation Strategies

The Nuclear Regulatory Commission (NRC) issued Reference (a), Order for Interim Safeguards and Security Compensatory Measures (Order EA-02-026 or ICM Order) for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs).

Order EA-02-026 imposed requirements on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 Code of Federal Regulations Part 50. The Order required licensees to implement certain changes described in Attachment (2) to the Order on an interim basis until final requirements were established. Among other requirements, Calvert Cliffs was required to complete implementation of Attachment (2) Section B.5.b of Order EA-02-026 by August 31, 2002. Calvert Cliffs submitted its response to Section III, Condition B.1 of Order EA-02-026 in Reference (b) and supplemented the response in Reference (c).

Subsequently, the NRC issued Reference (d), Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors (Order EA-03-086 or DBT Order) and other security-related Orders for Calvert Cliffs. In many ways, Order EA-03-086 complemented or superseded the requirements of the interim measures imposed by Order EA-02-026.

As required by Order EA-03-086, the plans for Calvert Cliffs have been implemented. Subsequently, Calvert Cliffs was requested in Reference (e) to respond by May 31, 2005, and to implement appropriate enhancement to current mitigation strategies by August 31, 2005. Specifically, nuclear power plant licensees were requested by Enclosure 2 to Reference (e) to review the Areas of Consideration delineated in Attachment A to the Enclosure. Licensees were also requested to evaluate additional considerations for potential inclusion in the mitigating strategies that licensees deemed appropriate in accordance with Attachment B to the Enclosure.

NOTE: ATTACHMENT (1) TO THIS LETTER CONTAINS "SAFEGUARDS INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON REMOVAL OF THE ATTACHMENT, THIS LETTER IS "DECONTROLLED."

SAFEGUARDS INFORMATION

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Subsequently, the Nuclear Energy Institute (NEI), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use, to assist licensees in responding to Reference (e).

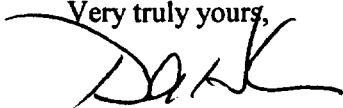
As requested in Reference (e), we have reviewed the information in Attachments A and B in accordance with the NEI Guidance and are hereby submitting Attachment (1) to this letter as Safeguards Information. Attachment (1) reflects the results of a comprehensive and thorough review of the guidance and describes the considerations that we either have already implemented or intend to implement by August 31, 2005.

The primary guiding principles used in the conduct of this evaluation were (1) whether or not equipment and resources were "readily available," and (2) if equipment is readily available, can it be effectively utilized in a licensee's mitigating strategy. We considered "readily available" to mean that the equipment or resources was already licensee owned, under contract, or part of an existing Memorandum of Understanding. The second criterion is to ensure that the equipment can be used in a mitigating strategy in an effective manner. Even if the equipment is readily available, it is of no value if it cannot be effective in implementing the mitigating strategy.

In accordance with these principles, mitigative strategies are being implemented to address the NRC B.5.b. guidance. These strategies are considered to be regulatory commitments and will be managed in accordance with the Calvert Cliffs Commitment Management System, which is based on NEI 99-04, Guidelines for Managing NRC Commitment Changes.

Attachment (2) to this letter is the schedule of actions remaining to be taken regarding the implementation of regulatory commitments resulting from the evaluation documented in Attachment (1).

Should you have questions regarding this matter, please contact Mr. L. S. Larragoite at (410) 495-4922 or Louis.Larragoite@constellation.com.

Very truly yours,


for
George Vanderheyden
Vice President -- Calvert Cliffs Nuclear Power Plant

GV/ALS/bjd

REFERENCES:

- (a) Letter from Mr. S. J. Collins (NRC) to Mr. C. H. Cruse (CCNPP), "Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Calvert Cliffs Nuclear Power Plant Units 1 & 2," dated February 25, 2002
- (b) Letter from Mr. C. H. Cruse (CCNPP) to Document Control Desk (NRC), "Response to Commission Order to Modify License for Interim Safeguards and Security Measures," dated March 15, 2002
- (c) Letter from Mr. C. H. Cruse (CCNPP) to Document Control Desk (NRC). "Supplemental Response to Commission Order to Modify License for Interim Safeguards and Security Measures," dated May 30, 2002

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May 31, 2005

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- (d) Letter from Mr. S. J. Collins (NRC) to Holders of Licenses for Operating Power Reactors, "Issuance of Order Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors," dated April 29, 2003
- (e) Letter from Mr. J. E. Dyer (NRC) to Holders of Licenses for Operating Power Reactors, "NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b," dated February 25, 2005

Attachments: (1) Evaluation of Strategies (Safeguards Information)
(2) Schedule for Completion

cc: Director, Office of Nuclear Reactor Regulation
S. J. Collins, NRC

With Attachment (2) only
R. V. Guzman, NRC
Resident Inspector, NRC
R. I. McLean, DNR