James A. Spina Vice President

Calvert Cliffs Nuclear Power Plant, Inc. 1650 Calvert Cliffs Parkway Lusby, Maryland 20657 410.495.5200 410.495.3500 Fax



April 4, 2007

Captain of the Port U.S.C.G. Sector Baltimore 2401 Hawkins Pt. Rd., Bldg. 70 Baltimore, MD 21226

ATTENTION: CAPT Brian Kelley, USCG

SUBJECT:

Calvert Cliffs Nuclear Power Plant Response to Request for Additional Information Supplemental to our Notice of Intent for Barge Shipment of Reactor Vessel Closure Heads to RACE LLC in Memphis, TN (DOT Docket No. PHMSA-2006-23643)

REFERENCES:

- (a) Letter from CDR Brian Penoyer (USCG) to Mr. Jay Gaines (CCNPP), dated January 25, 2007, Request for Additional Information related to the intent to ship Class 7 Radioactive Material from CCNPP
- (b) Letter from Mr. James A. Spina (CCNPP) to CDR Brian Penoyer (USCG), dated November 10, 2006, Notice of Intent to the United States Coast Guard for Barge Shipment of Reactor Vessel Closure Heads to RACE LLC in Memphis, TN

In Reference (a), the United States Coast Guard (USCG) requested additional information related to our notice of intent to ship Class 7 Radioactive Material via barge from Lusby, MD to Memphis, TN (Reference b). This letter provides the response to your request, as detailed below. Please note that we are scheduled to begin loading the subject shipment onto the barge on or around May 7, 2007. Shipment is anticipated approximately one week later. A review by the Captain of the Port – USCG is requested to determine if Calvert Cliffs Nuclear Power Plant (CCNPP) has complied with the applicable requirements of Title 33, Code of Federal Regulations, Parts 101, 105, 110, and 126. Your communication of the results of this review to us no later than April 27, 2007 is necessary to ensure critical resources are staged and ready to support this evolution.

Request 1:

Affirm that the material intended for shipment as surface contaminated object (SCO II, UN2913) will not meet DOT [Department of Transportation] limits for Highway Route Controlled Quantities (HRCQ) of radioactive material.

CCNPP Response:

The proposed shipment will contain < 1% of the applicable HRCQ radioactive materials. In-field surveys have been performed to verify our initial calculations.

DcD- 6/0107

CAPT Brian Kelley, USCG April 4, 2007 Page 2

Request 2:

Submit documentation demonstrating that your current security program enforced by the Department of Energy/Nuclear Regulatory Commission, including the security standards, oversight, notifications, and audit program, are equivalent to the requirements in the Marine Transportation Security Act (MTSA).

<u>CCNPP Response</u>:

Calvert Cliffs Nuclear Power Plant seeks a one time waiver from the MTSA of 2002 security requirements within 33 CFR Part 105.

Calvert Cliffs Nuclear Power Plant has been designated by your office as a waterfront facility under 33 CFR Part 126 due to our intent to ship, via barge, class 7 radioactive material that will be classified as surface contaminated objects (SCO II, UN 2913) per 49 CFR 173.427. This is a one time shipment to occur on or about May 14, 2007. The site-specific Security Plan, required per 10 CFR Part 73 and described below, is available for your on-site review should you determine it necessary to verify that CCNPP meets the security requirements contained in 33 CFR Part 105.

Calvert Cliffs Nuclear Power Plant has written security procedures established to ensure the requirements, as outlined in 10 CFR 73.55, are met. These procedures include a Security Plan, Training and Qualification Plan, Contingency Plan, and their associated implementing procedures. These documents are considered Safeguards Information and are controlled in accordance with 10 CFR 73.21. We intend to extend to the barge loading dock the same security measures we employ at our facility during this one time operation. Therefore we request a waiver of the 33 CFR Part 105 facility security regulations for this one time shipment of radioactive materials.

Request 3:

Submit details regarding loading operations and suitability of the pier and ramp system to load Class 7 radioactive cargo to the barge from the facility. Include a copy of the latest pier survey, along with an engineering analysis on the pier and ramp system supporting the intended loading operation.

CCNPP Response:

The last pier survey is provided as Attachment (1). The engineering analyses of the pier and ramp system are provided as Attachment (2). Please note that CCNPP has transported 12 components with gross package weights greater than the reactor vessel closure head packages on the pier system since 2001.

Request 4:

Submit, at least 30 days prior to transport, the name(s) and official number(s) of the contracted vessels along with the marine surveyor's suitability report referred to in the CCNPP letter and package to USCG. The barge must meet the standards for construction, stability, equipment, and certificates (including load line and Certificate of Inspection) outlined in the USCG Navigation and Inspection Circular (NVIC) 2-87. In addition, the barge must be made available for inspection and load monitoring by the Captain of the Port staff before and during loading.

<u>CCNPP Response</u>:

The suitability survey for Deck Barge CBC 4504 is provided as Attachment (3). The specific deep water and maneuvering tugs have not been selected but will be communicated to your office as soon as they are known.

CAPT Brian Kelley, USCG April 4, 2007 Page 3

Request 5:

Contact should be made with the United States Army Corps of Engineers if dredging will be needed to accommodate this barge.

CCNPP Response:

It is not anticipated that dredging will be needed to accommodate the barge based on water depth soundings that were performed in September 2006. Additional water depth soundings have also been performed during March 2007. The recent soundings verified no significant changes as a result of winter storms, etc. This data has been utilized by Canal Barge in their barge selection.

Request 6:

For planning purposes, notify the USCG Caption of the Port office of the expected dates and times of the barge loading and departure as soon as possible.

<u>CCNPP Response</u>:

All preliminary work (placement of barge at dock, building of bridge from dock to barge, staging of gantry jacks, rails and beams on barge, etc.) plus the actual loading of the Shipping Containers onto the barge are being scheduled for the weeks of May 7-13, 2007 and May 14-20, 2007. Departure of the barge should occur sometime during the second week (May 14-20, 2007).

Should you have any additional questions regarding this matter, please contact Mr. Jay S. Gaines at (410) 495-5219.

Very truly yours,

JAS/MJY/bjd

Attachments:

- (1) URS Corporation Pier Survey
- (2) (BIGGE) Ramp and Pier System Engineering Analysis
- (3) (STUDSVIK/RACE) Calvert Cliffs RVCH Units #1 & &2 Deck Barge CBC 4504 Suitability Survey

cc: (Without Attachments)

Document Control Desk, NRC D. V. Pickett, NRC S. J. Collins, NRC Resident Inspector, NRC R. I. McLean, DNR