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UniStar
NUCLEAR ENERGY

10 CFR 52.3
10 CFR 52.79

March 23, 2009

UN#09-164

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016
Calvert Cliffs Nuclear Power Plant, Unit 3
Supplemental Responses for RAI 21g and TE-15

Reference: Letter UN#08-060 G. Gibson (UniStar Nuclear Energy) to Document Control Desk (U.S. Nuclear Regulatory Commission), Submittal of Response to Requests for Additional Information, Environmental Impact Statement Issues, dated October 31, 2008

The referenced letter provided UniStar Nuclear Energy's supplemental responses to Requests for Additional Information (RAIs) related to the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Environmental Report (ER). Specifically, the referenced letter identified that the requested mitigation plan for historic properties and the wetland mitigation plan had not been developed due to the stage of the project's development and that supplemental responses would be provided when the subject plans were completed.

Enclosed is additional supplemental information regarding RAI 21g and TE-15 regarding the mitigation plan for historic properties and wetland mitigation plan, respectively.

The regulatory commitment identified in the referenced letter for this RAI is considered closed with this submittal. There are no new regulatory commitments in this correspondence.

If you have any questions, please call Mr. Dimitri Lutchenkov at (410) 470-5524.

D096
NRO

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 23, 2009

Greg Gibson

Enclosure: Calvert Cliffs Nuclear Power Plant, Unit 3 Supplemental Responses to NRC Requests for Additional Information 21g and TE-15

cc: John Rycyna, NRC Safety Project Manager, U.S. EPR COL Application
Thomas Fredrichs, NRC Environmental Project Manager, U.S. EPR COL Application
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2
Loren Plisco, Deputy Regional Administrator, NRC Region II (w/o enclosure)
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application (w/o enclosure)
U.S. NRC Region I Office

Enclosure

Calvert Cliffs Nuclear Power Plant, Unit 3
Supplemental Responses to NRC Requests for Additional Information

21g and TE-15

Item Number 21g (Supplemental) ER Sections 2.5.3, 4.1.3, 5.1.3 and 10.5

Explain how the impacts to historic properties are determined to be "moderate." [Original RAI request 05/13/08]

Provide (1) a mitigation plan for historic properties; and (2) the basis for concluding that the impacts to historical properties during construction will be MODERATE. [EIS Item 4 a verbal request from J. Colaccino on 10/14/08]

UniStar Response (Supplemental Response for RAI 21g):

UniStar provided the response to RAI 21g to the NRC in letter UN#08-018. In response to a further verbal request from J. Colaccino for clarification to RAI 21g, additional information was provided in UN#08-060. As such, no additional response regarding "impact" to historic properties is provided herein.

UniStar received the concurrence letter from the Maryland Historic Trust (MHT) State Historic Preservation Officer (SHPO) on the Phase I/II (Archaeology), Criteria and Effects Evaluation (Architecture), and Submerged Cultural Resources Survey reports on February 13, 2009 (Attachment 1). The receipt of this concurrence establishes the basis for developing and executing a Memorandum of Agreement (MOA) between UniStar and MHT/U.S. Army Corps of Engineers (USACE) (lead federal and state agencies). MOA development will start in Q1 '09 and is expected to be executed in Q2 '09. In addition, the MHT provided draft language for the "Unanticipated Discoveries Plan" which will be incorporated into the MOA (Attachment 2). As "Conditions" in the CPCN, the MOA must be executed and the "Unanticipated Discoveries Plan" developed prior to commencing any site preparation activities within the limits of cultural resources property.

The MOA establishes the framework/scope for developing the plan for "Mitigation/Minimization of Adverse Effects to Architectural Resources." This plan will be developed by UniStar and submitted to both USACE and MHT for review and approval. The NRC is on standard distribution for all correspondence with USACE and MHT and, as such, will be kept abreast of the approval and update process. The plan is expected to be completed in Q2 '09.

COLA Impact:
Changes to Environmental Report Sections 2.5.3, 4.1.3, 5.1.3 and 10.5 are required to reflect the results of the Phase II investigation and the subsequent review by the Maryland SHPO. UniStar letter UN#09-140, dated March 5, 2009, in response to NRC RAI 1006-1, provides the markups of these ER sections. These changes will be included in a future revision to the COLA.

Maryland Department of Planning
Maryland Historical Trust

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Richard Eberhart Hall
Secretary

Matthew J. Power
Deputy Secretary

February 13, 2009

Mr. William Seib
Chief, Maryland Section Southern
Regulatory Branch, Baltimore District
U.S. Army Corps of Engineers
P.O. Box 1715
Baltimore, MD 21203-1715

Re: MHT Review of Phase II National Register Evaluations and Assessment of Effects for Cultural Resources, Calvert Cliffs Nuclear Power Plant Expansion, Calvert County, Maryland

Dear Mr. Seib:

The Maryland Historical Trust (Trust) has received additional information related to the above-referenced undertaking. The Trust first received notice of the proposed expansion of the Calvert Cliffs Nuclear Power Plant from UniStar Nuclear in October of 2006. Since that time, investigations have been undertaken to identify historic resources that may be within the project's area of potential effect and to assess the effects of the proposed construction on those resources. While other federal agencies will be involved in the regulating and permitting of the eventual operation of the plant, it is our understanding that the Corps is the primary federal agency that will be reviewing and permitting the site preparation activities and the actual construction of the facility. We are therefore writing to the Corps pursuant to Section 106 of the National Historic Preservation Act to continue consultation regarding effects on archeological resources (both terrestrial and underwater) and the historic built environment.

Archeology: The Trust has been provided with copies of the draft reports on the Phase I and Phase II archeological investigations that have been conducted for the above-referenced project. The primary draft report, *Phase I Cultural Resources Investigations and Phase II National Register Site Evaluations, Calvert Cliffs Nuclear Power Plant, Calvert County, Maryland* (Munford et al. 2008) was prepared by GAI Consultants, Inc. and presents the necessary documentation on the goals, methods, results, and recommendations of both Phase I and Phase II investigations that have been conducted within the project area. The document is notably well-organized and well-written and is consistent with the reporting requirements of the *Standards and Guidelines for Archeological Investigations in Maryland* (Shaffer and Cole 1994). Please note, however, that the following items must be addressed in the preparation of the final document:

- The title for Figure 1-1 (Project Area) should include the appropriate quadrangle name (Cove Point).
- The report should specify that all materials remains and field records generated by the investigations will be deposited with the Maryland Archeological Laboratory for long-term preservation.

- While the report acknowledges that site 18CV474 has the potential to address research questions relating to Maryland's slave economy, transformations following emancipation, and domestic agricultural sites in the nineteenth century, it may be helpful to include a list of more *specific* and more detailed research questions that could be explored through further investigation of this site.

As noted in our letter dated June 7, 2007, Phase I survey work resulted in the identification of fourteen archeological sites, and the Trust recommended that Phase II evaluative studies be conducted at four of these sites (18CV474, 18CV480, 18CV481, and 18CV482) to evaluate the resources in terms of their eligibility for the National Register of Historic Places. The Phase II investigations were carried out between March and May of 2008 and consisted of the excavation of 961 additional shovel test pits and 46 test units. Sites 18CV481 and 18CV482 have both been identified as late nineteenth century domestic sites. Both sites have been heavily disturbed by mechanical earth-moving activities, and GAI has recommended that the two sites are not eligible for listing in the National Register of Historic Places. Based on the information presented in the draft report, we concur that sites 18CV481 and 18CV482 do not meet the criteria for eligibility in the National Register given their loss of integrity and inability to yield any additional information. Further investigations of these two sites are not warranted.

Site 18CV480 represents the location of the former Parran's Park farmstead (CT-58) – a mid-nineteenth to twentieth century landowner's domestic complex that was demolished by BG&E in 1972. A total of 24, 938 artifacts have been recovered from the site, including a variety of historic ceramics (predominantly undecorated whiteware, but also transfer print, hand-painted, edge decorated, and sponge decorated whiteware), glassware, cut nails, brick fragments, window glass, porcelain doll fragments, glass marbles, buttons, coins, combs, medicine bottles, and tobacco pipe fragments. The remnants of seventeen cultural features were also identified, including a deep pit feature, five stone wall or pier sections, and several postholes/molds. Despite the high density of artifacts and the presence of partial features, the Phase II investigations have clearly revealed that the site has been heavily impacted by modern activities. The area where the house once stood was evidently bulldozed and graded when the structure was razed, and other areas have been excavated and used as borrow sites during the construction of the existing power plant. Due to the significantly reduced integrity of the site, GAI has recommended that site 18CV480 is not eligible for listing in the National Register. Based on the information presented in the draft report, we concur that site 18CV480 does not meet the criteria for eligibility in the National Register given its loss of integrity and inability to yield any additional information. Further investigation of this site is not warranted.

Site 18CV474, on the other hand, has been identified as a mid-nineteenth to early-twentieth century domestic site possessing remarkably good integrity. A total of 3,644 artifacts have been recovered from the site, including a variety of temporally diagnostic ceramics (pearlware, yellowware, and whiteware), bottle glass, cut nails, brick fragments, window glass, lamp chimney glass, buttons, tobacco pipe fragments, and a glass bead. Four intact features have also been identified, including a stone foundation and chimney base, a builder's trench, an area of stone paving, and a possible pier support for a north addition. The temporally diagnostic artifacts and cartographic sources indicate that this site was occupied from ca. 1850 to 1910, and the limited quantity and variety of decorated ceramics suggests that the residents were of a lower socioeconomic status than the landowners who were residing at site 18CV480. The property encompassing these sites was, in fact, owned and occupied by the Somervell family during the eighteenth and nineteenth centuries, and census data indicates that this locally prominent family relied heavily on enslaved labor throughout the first half of the nineteenth century. The Slave Schedule of the 1860 census, for example, identifies Alexander Somervell as the owner of 52 slaves, and Charles Somervell (Alexander's son) as the owner of sixteen slaves. Housing for these slaves

may have been dispersed throughout the Somervell plantation, and the archeological investigations conducted at site 18CV474 indicate that the site may represent one such residence for some of the slaves and/or tenants, sharecroppers, or freed African Americans.

As noted above, site 18CV474 has retained much of its integrity and has the potential to yield significant information regarding domestic agricultural sites in nineteenth century southern Maryland. Specifically, additional archeological investigations may be able to address research questions relating to Maryland's slave economy and the wide variety of transformations that took place following emancipation. GAI has therefore recommended that site 18CV474 is eligible for listing in the National Register under Criterion D and that, if possible, the site should be preserved in place. Based on the information presented in the report, we concur that site 18CV474 is indeed eligible for inclusion in the National Register.

The expansion of the Calvert Cliffs Nuclear Power Plant, as currently proposed, would result in the destruction of site 18CV474 and would constitute an adverse effect on this significant archeological resource. To continue the Section 106 consultation process, the Corps of Engineers and UniStar Nuclear Development will need to continue to coordinate with the Trust on ways to avoid or mitigate the adverse effect on the site. If site avoidance is not possible, UniStar will need to provide the Trust with documentation detailing the constraints and providing justification as to why site 18CV474 cannot be avoided during construction. If site avoidance is not possible, Phase III data recovery investigations will be warranted to mitigate the undertaking's adverse effects on the archeological property. All parties will need to negotiate and execute a Memorandum of Agreement (MOA) that stipulates the agreed-upon mitigation measures, including the Phase III investigations, methods of public outreach and interpretation, and the curation of all artifacts and materials generated by the investigations conducted at site 18CV474. The Trust must be provided with a draft Data Recovery Plan for site 18CV474 so that we may provide appropriate comments and recommendations. Following our review and approval of the Data Recovery Plan, we will be happy to draft an MOA for the purposes of review and comment.

Please note that a supplemental Phase I Cultural Resources Investigation report was submitted to our office by UniStar on February 9, 2009. This document provided a summary of the methods, results, and recommendations of Phase I archeological investigations that were carried out at three new localities (Preston's Cliffs Wetland Mitigation Area, Camp Conoy Wetland Mitigation Area, and the Old Bay Farm Access Road). In short, the supplemental Phase I survey identified an extension of a previously-recorded site – 18CV7. This site represents an early nineteenth to twentieth century domestic component associated with the National Register eligible Preston's Cliffs Farmstead (CT-59). We understand that the portion of site 18CV7 that was most recently recorded by GAI is located within the Preston's Cliffs Wetland Mitigation Area and may be impacted by tree planting activities. GAI has recommended either site avoidance or further (Phase II) archeological investigations to evaluate the site's National Register eligibility prior to these activities. It is our opinion, however, that a Phase II study of the portion of site 18CV7 that is to be impacted would not be meaningful or appropriate at this time, as the purpose of a Phase II investigation is to evaluate an archeological resource in its *entirety* and to provide a definitive statement regarding the overall site's integrity, significance, and National Register eligibility. We are therefore recommending that the area containing a portion of site 18CV7 be reforested through the hand-planting of seedlings, as this practice is unlikely to have an adverse effect on the potentially significant nineteenth-century archeological resource. Please provide our office with a copy of the wetland mitigation plan and map (including proposed planting techniques) for the Preston's Cliffs Wetland Mitigation Area for our review, when this information becomes available. If UniStar is unable to

utilize the hand-planting of seedlings technique in the area of site 18CV7, then further consultation regarding potential impacts to this site will be necessary.

Underwater Archeology: On January 20, 2009, the Maryland Historical Trust (Trust) received a copy of the draft report on the Phase I underwater archaeological survey that was conducted for the above-referenced project. The document was prepared by Panamerican Consultants, Inc, and prepared for MACTEC Federal Programs, Inc. We have reviewed the draft report in accordance with Section 106 of the national Historic Preservation Act of 1966, as amended, and are writing to provide our comments regarding effects on historic and archeological properties.

The draft report, *Submerged Cultural Resources Survey of a Proposed Outfall Pipe, Calvert Cliffs Nuclear Power Plant Unit 3 Construction, Calvert County, Maryland* (Faught 2008), is not consistent with the reporting requirements of the Trust's *Standards and Guidelines for Archeological Investigations in Maryland* (Shaffer and Cole 1994) and will require revisions before the report can be accepted.

The Phase I survey was carried out during March of 2008 and consisted of an electronic remote-sensing survey within the proposed project area utilizing side-scan sonar, magnetometer, and sub-bottom profiler. Although the Maryland Inventory of Historic Properties records no known historic resources within the project area, the dredging activity has the potential for destroying currently unknown archeological, scientific, prehistoric, or historical data. While the draft Phase I report states that "none of the magnetic anomalies or side-scan targets are considered potentially significant for the purpose of this investigation", the Trust feels that the author of the report failed to adequately illustrate the lack of significance with clear figures and data. The lack of a clearly defined project APE within the report also hampered the Trust's ability to determine which of the targets might be impacted by the proposed construction of the outfall pipe. Much of the surveyed area appears well south of the proposed outfall pipe. The Trust is also confused by the use of 100-ft lane spacing, when the Trust often requires 50-ft lane spacing in submerged cultural resource surveys to ensure complete coverage and adequate resolution of the magnetic anomalies that might represent historic wrecks or other archeological resources. Specific comments and recommendations will follow.

Based on the documentation presented in this report, we concur that the proposed outfall pipe construction is unlikely to impact any significant cultural resources. For this reason, we believe that the portion of the Calvert Cliffs Nuclear Power Plant that includes the Proposed Outfall Pipe possesses no archeological research potential and that further archeological investigations are not warranted for Section 106 purposes. If the proposed outfall pipe is realigned, per the report recommendations, further consultation will be required and a resurvey of the area might be requested. The Section 106 requirements for this particular undertaking have, in fact been fulfilled. We look forward to receiving two copies of the final report, revised to address the Trust's comments, for our library.

Specific Comments:

- All maps should contain a North Arrow and a Scale
- P. 1 Introduction. The survey area should be stated in acres and hectares.
- P. 3 Environmental Setting: No evidence is provided for the statement, "The geologic beds of the cliffs (eroded portions of old sediment beds) apparently continue underwater according to the sidescan record."
- P. 4 figure 4 requires a citation

- P. 7- 8 Methods: magnetometer - section needs to include the coverage of the magnetometer and the height towed above the seafloor.
- P. 12 Methods: GIS Mapping Locational Controls and Analysis – the bathymetric map referenced in this section was not included in the report
    - Figure 12– it would be helpful if a background image of the marine chart/USGS quad was included behind the track lines and magnetic data.
- P. 13-19 Results Section
    - There is not enough information in this section of the report to independently verify the author's results
        - M06, in particular, needs to be described in more detail, and the rationale for dismissing this object, which has a relatively large amplitude and long duration and is described as a complex dipole.
        - Higher resolution images of side-scan targets 1 – 4 need to be included for completeness, and so that the Trust can assess these objects.
        - Fig. 17-18 - it would be helpful if a background image of the marine chart/USGS quad was included behind the mosaics.
        - The results section references a paleochannel feature identified with the subbottom profiler, but there is no direct evidence of the presence of the paleochannel other than the green shading included on Figure 18. The section on the presence and interpretation of the paleochannel needs to be included so that individuals reading the report can clearly and independently verify its presence.

Historic Built Environment: Investigations to identify historic buildings, structures, and landscapes that might be affected by the proposed power plant expansion identified four places that are eligible for listing in the National Register of Historic Places. Parran's Park (CT-58) and Preston's Cliffs (CT-59) contain tobacco barns that are significant for their association with agricultural history. The Drum Point Railroad Bed (CT-1295) is significant for its association with local history and engineering. Camp Conoy (CT-1312) is significant for its association with important trends in recreational and social history.

The Trust has reviewed the recommendations in the report *Letter Report, Criteria of Effects Evaluation, Calvert Cliffs Nuclear Power Plant*. The report finds that the proposed power plant expansion will not adversely affect Parran's Park or Preston's Cliffs. The report also finds that the proposed work will require the alteration and demolition of portions of the Drum Point Railroad Bed and Camp Conoy. The Trust agrees that these changes would constitute an adverse effect to historic properties.

In the event of an adverse effect finding, 36 CFR 800.6 requires the responsible agency to continue consultation with the Trust, other interested parties, and the general public to identify and consider alternative plans that can avoid; minimize; and, if necessary, mitigate adverse effects. Interested parties should include the county government and local history groups. Examples of efforts to minimize adverse effects include using vegetative buffers to minimize visual effects and moving, rather than demolishing, historic buildings. Examples of efforts to mitigate adverse effects include documentation and the study, survey, or repair of historic resources that are similar to those that must be demolished.

We recommend that the Corps's applicant proceed with the Section 106 process by consulting with as broad a range of interested parties as practical and compiling their recommendations about the best ways to avoid, minimize, and mitigate the adverse effects of the undertaking. As noted above, once the results of this consultation and detailed information about the nature of the adverse effects are provided to the Trust, the Trust will provide a draft MOA to the Corps and UniStar for review and consideration.

Thank you for providing us with this opportunity to comment. If you have questions or require assistance, please contact Dixie Henry (regarding terrestrial archeology) at 410-514-7638 \ dhenry@mdp.state.md.us, Jonathan Sager (regarding historic buildings and landscapes) at 410-514-7636 \ jsager@mdp.state.md.us, or Brian Jordan (regarding underwater archeology) at 410-514-7668 \ bjordan@mdp.state.md.us.

Sincerely,

J. Rodney Little
Director \ State Historic Preservation Officer
Maryland Historical Trust

JRL\DLH\JES
200803669
CC: Kathy Anderson (COE)
Susan Gray (PPRP)
R. McLean (DNR)
Yvonne F. Abernethy (Constellation Energy)
Dimitri Lutchenkov (UniStar)
Ben Resnick (GAI)
Barbar A. Munford (GAI)
Kirsti Uunila (Calvert County)

CALVERT CLIFFS NUCLEAR POWER PLANT UNIT 3 (CCNPP3) UNANTICIPATED DISCOVERIES PLAN

In order to minimize the potential for the accidental discovery of cultural resources, UniStar Nuclear will complete a detailed archaeological survey of the Calvert Cliffs Nuclear Power Plant Project (Project) Area of Potential Effect (APE) (locations associated with the proposed undertaking where there will be alteration and disturbance of surface and subsurface soils that contain or have the potential to contain archaeological sites; this includes proposed construction localities, plus access roads, and staging areas). To ensure that UniStar Nuclear maintains full and complete compliance with all federal and state regulations concerning the protection of cultural resources, an Unanticipated Discoveries Plan has been prepared for the Project.

All inspectors have the responsibility to monitor the construction sites for potential archaeological remains throughout construction. If, during the course of construction, potential cultural resource remains are identified, the Environmental Inspector will immediately notify the Construction Supervisor who will immediately halt work in the vicinity of the potential find. At this point, UniStar Nuclear will notify the State Historic Preservation Officer (SHPO) and the U.S. Army Corps of Engineers (ACOE) (serving as the lead federal agency for the Project) and will hire a state-approved archaeological consultant who will survey the site and provide an immediate verbal report to UniStar Nuclear and the SHPO. UniStar Nuclear will notify the ACOE of the report and continue to consult with the SHPO's office, as per the requirements of Section 106 of the National Historic Preservation Act. The SHPO contact for the CCNPP3 project is listed below:

Ms. Dixie Henry
Preservation Officer
Project Review of Compliance
Division of Historical and Cultural Programs
100 Community Place
Crownsville, MD 21032
(410) 514-7600

If the unanticipated discovery is determined to be ineligible for inclusion in the National Register of Historic Places (NRHP), UniStar Nuclear will proceed with the Project following written concurrence from the SHPO and approval from the ACOE. If the site is determined to be potentially eligible for inclusion in the NRHP, additional work, such as a Determination of Eligibility or Data Recovery, will be performed as required/approved by the SHPO and the ACOE. Further construction work at the site will be suspended until all criteria of Section 106 of the National Historic Preservation Act and other related federal and state regulations have been successfully completed.

In the event that human remains are discovered during construction, the Construction Inspector will immediately halt work and notify the local law enforcement agency and

medical examiner. If remains are found not to be of recent origin, UniStar Nuclear will contact the SHPO's office and begin consultation to ensure that all provisions of relevant Maryland law (Article 27, Statues 265 and 267; Title 10, Subtitle 4, Sections 10-401 through 10-404) are followed, including the MHT Burial Policy (Shaffer and Cole 1994:64). Provision for security to protect suspected burials from vandalism will be taken. UniStar Nuclear will notify the ACOE of the situation and will continue to keep the ACOE informed as to the progress of further consultation.

If the unanticipated discovery of human remains is determined by the SHPO and the ACOE to be ineligible for inclusion in the NRHP, UniStar Nuclear will proceed with coordinating the proper removal of the remains through cooperation from the local police, the medical examiner, the SHPO, and the ACOE. Only after the human remains have been properly removed from the site should construction activities in the site area be resumed.

Under no circumstances should human remains be removed from the site without completing all permitting and coordination processes with the local police, the medical examiner, the SHPO, Native American representatives as appropriate, and the ACOE. Further work at the site will be suspended until all criteria of Section 106 of the National Historic Preservation Act and other related state and federal regulations have been successfully completed.

DRAFT

Item Number TE-15 (Supplemental) **ER Section 4.6**

Provide Wetland Mitigation Plan as discussed at the site audit in March. [Original RAI request 05/13/08]

Describe any proposed changes in the wetland mitigation plan since it was first submitted in the Draft Report: Conceptual Wetland/Stream Compensatory Mitigation Plan, by MACTEC, dated June 16, 2008. [EIS Item 11, a verbal request from J. Colaccino on 10/14/08]

UniStar Response (Supplemental Response to RAI TE-15):

A draft Wetland/Stream Compensatory Mitigation Plan was provided in UN#08-018. Subsequently, further inquiry into proposed changes was requested and responded to in UN#08-060 indicating that comments (on the plan) by the USACE and State of Maryland were still pending. The agencies also acknowledged that the mitigation plan would be a live document that would be further expanded/updated based on final conditions and construction activities. Based on this guidance, additional comments by various agencies, and knowledge gained as the permitting process matured, UniStar developed the "Phase I Compensatory Mitigation Plan for non-tidal and stream impacts associated with Calvert Cliffs Unit #3, dated February 18, 2009." This Phase 1 plan was forwarded to MDE and USACE for review and approval via UN#09-139 on February 18, 2009. This document represents the first step of the development of the compensatory mitigation plan for proposed impacts to nontidal wetlands on the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 project. UniStar forwarded a CD containing the Calvert Cliffs Unit #3 Phase 1 Mitigation Plan to the NRC on March 3, 2009, via UN#09-144. The NRC is on standard distribution for all correspondence with USACE and Maryland state agencies and, as such, will be kept abreast of the approval and update process with the lead agencies.

COLA Impact:

No changes to the Environmental Report are required.