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March 9, 2010

UN#10-063

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

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016
Response to Request for Additional Information for the
Calvert Cliffs Nuclear Power Plant, Unit 3,
RAI No. 208, Operating Organization

Reference: Surinder Arora (NRC) to Robert Poche (UniStar Nuclear Energy), "FINAL RAI
No. 208 CHPB 4192," email dated February 5, 2010

The purpose of this letter is to respond to the request for additional information (RAI) identified in the NRC e-mail correspondence to UniStar Nuclear Energy, dated February 5, 2010 (Reference). This RAI addresses the Operating Organization, as discussed in Section 13.1.2 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA), Revision 6.

The enclosure provides our response to RAI No. 208, Question 13.01.02-13.01.03-11, and includes revised COLA content. A Licensing Basis Document Change Request has been initiated to incorporate these changes into a future revision of the COLA.

Our response does not include any new regulatory commitments. This letter does not contain any sensitive or proprietary information.

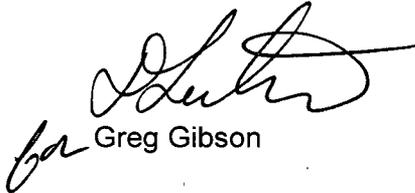
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If there are any questions regarding this transmittal, please contact me at (410) 470-4205, or Mr. Wayne A. Massie at (410) 470-5503.

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

Executed on March 9, 2010


for Greg Gibson

Enclosure: Response to NRC Request for Additional Information RAI No. 208, Question 13.01.02-13.01.03-11, Operating Organization, Calvert Cliffs Nuclear Power Plant, Unit 3

cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch
Laura Quinn, NRC Environmental Project Manager, U.S. EPR COL Application
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application (w/o enclosure)
Loren Plisco, Deputy Regional Administrator, NRC Region II (w/o enclosure)
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2
U.S. NRC Region I Office

GTG/RJP/mdf

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Enclosure

**Response to NRC Request for Additional Information
RAI No. 208, Question 13.01.02-13.01.03-11, Operating Organization
Calvert Cliffs Nuclear Power Plant, Unit 3**

RAI No. 208

Question 13.01.02-13.01.03-11

CCNPP-3 FSAR Tier 2, Rev. 6, Section 13.1.2.2 describes the functions and responsibilities of plant personnel for the safe operations of the plant. Although FSAR Tier 2, Section 13.1.2.2 provides a broad overview of illustrative functions for the Radiation Protection/Chemistry Manager and Radiation Protection/Chemistry Shift Supervisors, the listing of responsibilities is found to be incomplete given the commitments described in CCNPP-3 FSAR Tier 2, Sections 11.4 and 11.5. Specifically:

1. Radiation Protection/Chemistry Manager - The functions described in FSAR Section 13.1.2.2.1.1.3 should be revised to include programs for managing radioactive liquid and gaseous effluent releases and associated offsite doses in addition to radioactive wastes, and conduct of the radiological environmental monitoring program. The applicant is requested to revise the responsibilities of the Radiation Protection/Chemistry Manager by including such functions in demonstrating compliance with Part 20.1301 and Appendix I to Part 50, given the commitment of CCNPP-3 FSAR Tier 2, Sections 11.5.2 in implementing a site-specific ODCM.
2. Radiation Protection/Chemistry Shift Supervisors - The functions described in FSAR Section 13.1.2.2.1.1.3.2 do not include responsibilities for the processing, sorting, packaging, storage, shipment of low-level radioactive wastes to disposal site or storage facilities, and shipment of radioactive materials and equipment to waste processors and equipment manufacturers for maintenance. The applicant is requested to revise the responsibilities of the Radiation Protection/Chemistry Shift Supervisors by including such functions in demonstrating compliance with Parts 20 and 61, given the commitment of CCNPP-3 FSAR Tier 2, Section 11.4.3 in implementing a site-specific PCP.

Response

1. The listing of Radiation Protection/Chemistry Manager functions identified in FSAR Section 13.1.2.2.1.1.3 will be updated to include the programs for managing radioactive liquid and gaseous effluent releases and associated offsite doses, radioactive wastes, and conduct of the radiological environmental monitoring program. These changes are as shown in the COLA Impact portion of this response.
2. The functions identified in this question are assigned to the Supervisor – Materials Processing. The description of functions assigned to the Supervisor – Materials Processing in FSAR Section 13.1.2.2.1.1.3.4 will be updated to include responsibility for processing, sorting, packaging, storage, and shipment of low-level radioactive wastes to disposal sites or storage facilities, and shipment of radioactive materials and equipment to waste processors and equipment manufacturers for maintenance. These changes are as shown in the COLA Impact portion of this response.

COLA Impact

FSAR Sections 13.1.2.2.1.1.3 and 13.1.2.2.1.1.3.4 will be updated in a future COLA revision as follows:

13.1.2.2.1.1.3 Radiation Protection/Chemistry Manager

The Radiation Protection/Chemistry Manager reports to the Plant General Manager and is responsible for providing for the radiological health and safety of plant personnel (including maintaining plant staff dose as low as reasonably achievable in accordance with Chapter 12) and members of the public. The Radiation Protection/Chemistry Manager is also responsible for managing the radioactive waste programs and for the implementation of the plant chemistry and non-radiological environmental monitoring programs. The Radiation Protection/Chemistry Manager functions as the Radiation Protection Manager (RPM), when designated.

Radiation Protection/Chemistry Manager duties include:

- Implementation of the radiation protection and plant ALARA programs, including programs for managing radioactive liquid and gaseous effluent releases and associated offsite doses;
- Provision of radiological and chemistry input into work and design planning;
- Tracking, analysis, and correction of trends in radiation work performance;
- Scheduling and conduct of radiological surveys, contamination sample collection, and determining contamination levels;
- Assignment of work restrictions through radiation work permits;
- Maintenance of required records in accordance with federal and state codes; and
- Maintenance of primary and secondary plant chemistry in accordance with established program requirements;
- Implementation of programs and controls for processing solid radioactive wastes; and
- Implementation of the radiological environmental monitoring program.

In this capacity as the RPM and in accordance with approved procedures, the Radiation Protection/Chemistry Manager has authority to direct or delegate direction of radiation protection staff to stop work or order an area evacuated when, the radiation conditions warrant such an action and the action is consistent with plant safety.

13.1.2.2.1.1.3.1 Supervisor - Chemistry Support

The Supervisor - Chemistry Support reports to the Radiation Protection/Chemistry Manager and is responsible for implementation and coordination of the plant Chemistry Program, including overall operation of any laboratories and non-radiological environmental monitoring. The Supervisor - Chemistry Support is also responsible for the administration and implementation of procedures and programs to ensure effective compliance with environmental regulations.

13.1.2.2.1.1.3.2 Radiation Protection/Chemistry Shift Supervisors

The individuals in these positions report to the Radiation Protection/Chemistry Manager and are responsible for in plant radiation protection and chemistry operations that include but are not limited to contamination control, radiation work permits, radiological surveys and surveillance activities, respiratory protection for radiological and industrial safety, the ALARA program,

radiation protection job coverage, personnel external dosimetry program, personnel internal dosimetry program, radioactive effluent release monitoring, and radiological environmental monitoring activities. The Radiation Protection/Chemistry Shift Supervisors and the Radiation Protection and chemistry technicians reporting to them work in a shift rotation with operations to provide radiation protection and chemistry coverage 24 hours per day.

13.1.2.2.1.1.3.3 Supervisor - Radiation Protection Support

The Supervisor - Radiation Protection Support reports to the Radiation Protection/Chemistry Manager and is responsible for ALARA planning, work package reviews in support of work control, RP input to proposed design changes, and maintenance of RP programs and procedures.

13.1.2.2.1.1.3.4 Supervisor - Materials Processing

The Supervisor – Materials Processing reports to the Radiation Protection/Chemistry Manager and is responsible for the processing and shipping of radioactive materials in accordance with applicable federal, state, and local regulations. The Supervisor – Materials Processing reports to the Radiation Protection/Chemistry Manager and is responsible for processing, sorting, packaging, storage, and shipment of low-level radioactive wastes to disposal sites or storage facilities, and shipment of radioactive materials and equipment to waste processors and equipment manufacturers for maintenance in accordance with applicable federal, state, and local regulations.