



10 CFR 52.75
10 CFR 2.390

December 20, 2010

UN#10-300

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

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016
Calvert Cliffs Nuclear Power Plant, Unit 3
Submittal of Revision 7 to the Combined License Application for the Calvert Cliffs
Nuclear Power Plant, Unit 3, and Application for Withholding of Documents

- Reference:
- 1) Greg Gibson (UniStar Nuclear Energy) to Document Control Desk (NRC)
"Submittal of Revision 6 to the Combined License Application for the Calvert
Cliffs Nuclear Power Plant, Unit 3, and Application for Withholding of
Documents," dated September 30, 2009.
 - 2) Sandra Sloan (AREVA NP Inc.) to Document Control Desk (NRC) "Submittal
of Revision 2 of the U.S. EPR Final Safety Analysis Report for Design
Certification, NRC:10:081," dated August 31, 2010.
 - 3) Greg Gibson (UniStar Nuclear Energy) to Document Control Desk (NRC)
"Response to Request for Additional Information for the Cliffs Nuclear Power
Plant, Unit 3, RAI 254, Liquid Waste Management, and RAI 255, Gaseous
Waste Management," dated November 16, 2010.
 - 4) Greg Gibson (UniStar Nuclear Energy) to Document Control Desk (NRC)
"Response to Request for Additional Information for the Cliffs Nuclear Power
Plant, Unit 3, RAI 260, Technical Specification Setpoint Control Program,"
dated November 19, 2010.
 - 5) Greg Gibson (UniStar Nuclear Energy) to Document Control Desk (NRC)
"Response to Request for Additional Information for the Cliffs Nuclear Power
Plant, Unit 3, RAI 281, Foreign Ownership," dated December 7, 2010.

Provided herein is Revision 7 to the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3
Combined License Application (COLA). The enclosed set of disks is a black revision line
version of the COLA. These disks supersede those previously submitted as Revision 6
(Reference 1).

D096
MRO

An updated set of COLA documents is being provided in electronic format on the two enclosed discs (Enclosures 1 and 2). Enclosure 1 contains information UniStar Nuclear Energy believes can be made publicly available. Enclosure 2 contains information that UniStar Nuclear Energy requests to be withheld from public disclosure.

COLA Revision 7 contains no Restricted Data or other defense information requiring separation in accordance with 10 CFR 50.33 (j). Part 9 of COLA Revision 7 contains certain financial, SUNSI and security-related information that UniStar Nuclear Energy is requesting the NRC to withhold from public disclosure in accordance with the requirements of 10 CFR 2.390. An appropriate affidavit (Enclosure 3) is included with this letter supporting proprietary treatment of UniStar Nuclear Energy financial information pursuant to 10 CFR 2.390.

Revision 7 of the CCNPP Unit 3 COLA incorporates the changes resulting from Revision 2 of the U.S. EPR FSAR (Reference 2), UniStar Nuclear Energy responses to NRC Requests for Additional Information (RAIs) submitted to the NRC through October 2010 (Revision 7 "freeze point") and COLA changes (FSAR and Environmental Report) associated with RAIs 254 and 255 (Reference 3) and RAI 260 (Reference 4).

Issues after the "freeze point" are not included in COLA Revision 7. These changes are related to U.S. EPR FSAR Revision 2 changes that require additional site specific engineering or analysis. These topics include:

- Toxic gas re-evaluation
 - Evaluation to be revised to address CO and CO₂
 - Evaluation of withdrawal of toxic gas exemption request is in progress
- Switchgear building ventilation COL Item 9.4-2
 - Detailed design is in progress
- Change from 3 to 2 Normal Auxiliary Transformers
 - Engineering for some site specific buses and loads is in progress
- FSAR Sections 3.7 and 3.8
 - Seismic analyses in progress pending U.S. EPR FSAR reconciliation
- Essential Service Water cooling tower recirculation effects
 - Engineering is in progress
- Ultimate Heat Sink Material Selection
 - Engineering is in progress

The above issues will be addressed in supplemental responses and are expected to be included in CCNPP COLA Revision 8.

As discussed with NRC Staff on December 8, 2010, UniStar is currently in the process of ownership transfer that will change information in COLA Part 1, FSAR Chapter 1, and other sections of the COLA. RAI 281 requested information about the details of this ownership change. The response to NRC RAI 281 will be provided as stated in Reference 5 and will be included in CCNPP COLA Revision 8.

This submittal contains PDF files, one or more of which may contain hyperlinks. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to the Internet that are essential for the use of this filing have been

submitted as part of the filing. Any material referenced by a hyperlink to another PDF that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

New regulatory commitments in this correspondence are listed in Enclosure 4.

If there are any questions regarding this transmittal, please contact me at 410-470-4205, or Wayne Massie of my staff at 410-470-5503.

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

Executed on December 20, 2010



Greg Gibson

- Enclosures:
- 1) Calvert Cliffs Nuclear Power Plant, Unit 3 COL Application Revision 7, Public DVD – Black Revision Line Version
 - 2) Calvert Cliffs Nuclear Power Plant, Unit 3 COL Application Revision 7, Proprietary and Security-Related DVD - Black Revision Line Version
 - 3) Affidavit for Withholding of Proprietary Information in Accordance with 10 CFR 2.390.
 - 4) List of Commitments

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

Enclosure 1

Calvert Cliffs Nuclear Power Plant, Unit 3

COL Application Revision 7

Public DVD

Black Revision Line Version

Enclosure 2

Calvert Cliffs Nuclear Power Plant, Unit 3

COL Application Revision 7

Proprietary and Security-Related DVD

Black Revision Line Version

Enclosure 3

Affidavit for Withholding of Proprietary Information
in Accordance with 10 CFR 2.390

ENCLOSURE 3

Affidavit of Gregory Gibson
(Page 1 of 2)

Gregory Gibson, being duly sworn, hereby deposes and states as follows:

1. My name is Gregory Gibson. I am the Vice-President Regulatory Affairs, for UniStar Nuclear Energy, LLC (UniStar).
2. I have been authorized by UniStar to execute this affidavit in support of UniStar's request to withhold proprietary information identified in UniStar's letter to the NRC UN#10-300, "UniStar Nuclear Energy, Docket No. 52-016, "Submittal of Revision 7 to the Combined License Application for the Calvert Cliffs Nuclear Power Plant, Unit 3, and Application for Withholding of Documents" hereafter referred to as the Proprietary Information, from public disclosure in accordance with the Nuclear Regulatory Commission (NRC) regulations appearing at 10 CFR 2.390(a)(4).
3. The Proprietary Information is being submitted as proprietary and confidential information as part of an enclosure to UniStar's letter UN#10-300 from Greg Gibson to the NRC Document Control Desk.
4. The Proprietary Information includes detailed financial information regarding costs and taxes associated with the construction and operation of the proposed U.S. EPR nuclear power plant at the Calvert Cliffs Nuclear Power Plant, Unit 3 Site (i.e. CCNPP Unit 3).
5. The Proprietary Information was prepared with the explicit understanding that the information itself would be treated as proprietary and confidential. The information should therefore be withheld from public disclosure. Indeed, UniStar has refrained from publicly disclosing this information. To the best of my knowledge and belief, the Proprietary Information has not otherwise been knowingly made available in any public source.
6. If the Proprietary Information was publicly disclosed, UniStar would suffer irreparable and incalculable harm. Specifically, UniStar's competitors would gain valuable insight into otherwise unavailable business strategies, plans, and financial details. By knowing the details included in the Proprietary Information, UniStar's competitors would obtain an unfair commercial advantage that would significantly affect UniStar's ability to compete. In addition, the success of the UniStar's future plans is governed in large part by the cost and tax information, and thus to publicly disclose this information as reflected in the Proprietary Information would result in substantial harm to the competitive position of UniStar.
7. Financial information by its nature is treated as confidential. The specific financial details in the Proprietary Information have not been publicly released for the reasons set forth above. Accordingly, withholding the Proprietary Information from disclosure will not adversely affect the public.

Affidavit of Gregory Gibson
(Page 2 of 2)

- 8. A redacted version of the Proprietary Information has been provided. This version is for public disclosure.
- 9. The Proprietary Information is being submitted to the NRC in confidence. This Proprietary Information is of a sort customarily held in confidence by UniStar, and in fact has been held in confidence and not otherwise previously publicly released.


Further Affiant sayeth not.

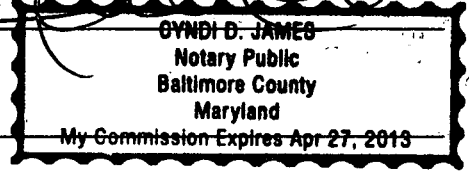


Gregory Gibson
Vice-President Regulatory Affairs
UniStar Nuclear Energy, LLC

Subscribed and sworn to before me,
Notary Public, this 20th day of December, 2010:

My Commission expires:





Enclosure 4

Calvert Cliffs Nuclear Power Plant Unit 3

List of Commitments

Calvert Cliffs Nuclear Power Plant Unit 3

List of Commitments

The following table identifies those actions committed to by UNE in this document. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to: Wayne Massie at (410) 470-5503.

| | Commitment | Due Date |
|------------|---|-------------------------------|
| CC-10-5846 | A re-evaluation of toxic gas analysis and exemption request will be included in CCNPP Unit 3 COLA | CCNPP Unit 3 COLA, Revision 8 |
| CC-10-5847 | Switchgear building ventilation information will be added to CCNPP Unit 3 COLA to address COL Item 9.4-2. | CCNPP Unit 3 COLA, Revision 8 |
| CC-10-5848 | Site specific information for the Normal Auxiliary Transformers busses and loads will be included in CCNPP Unit 3 COLA | CCNPP Unit 3 COLA, Revision 8 |
| CC-10-5849 | Revised seismic analysis will be incorporated into CCNPP Unit 3 COLA | CCNPP Unit 3 COLA, Revision 8 |
| CC-10-5850 | Results of an evaluation of essential service water cooling tower recirculation effects will be included in CCNPP Unit 3 COLA | CCNPP Unit 3 COLA, Revision 8 |
| CC-10-5851 | Describe the Ultimate Heat Sink Materials in the CCNPP Unit 3 COLA | CCNPP Unit 3 COLA, Revision 8 |