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CENG
a joint venture of
Constellation Energy · EDF

CALVERT CLIFFS
NUCLEAR POWER PLANT

January 28, 2011

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
Supplement to License Amendment Request: Transition from Westinghouse Nuclear Fuel to AREVA Nuclear Fuel

REFERENCES:

(a) Letter from Mr. T. E. Trepanier (CCNPP) to Document Control Desk (NRC), dated January 14, 2011, Supplement to the License Amendment Request: Transition from Westinghouse Nuclear Fuel to AREVA Nuclear Fuel

(b) Letter from Mr. T. E. Trepanier (CCNPP) to Document Control Desk (NRC), dated November 23, 2009, License Amendment Request - Transition from Westinghouse Nuclear Fuel to AREVA Nuclear Fuel

Reference (a) provided responses to several Nuclear Regulatory Commission audit questions. After review of Reference (a), the NRC requested supplemental information concerning one of the responses. The supplemental information is provided in Attachment (1). This supplemental information does not change the No Significant Hazards Determination previously provided in Reference (b).

A001
NRR

Should you have questions regarding this matter, please contact Mr. Douglas E. Lauver at (410) 495-5219.

Very truly yours,

George Gellrich

STATE OF MARYLAND :
: **TO WIT:**
COUNTY OF CALVERT :

I, George H. Gellrich, being duly sworn, state that I am Vice President - Calvert Cliffs Nuclear Power Plant, LLC (CCNPP), and that I am duly authorized to execute and file this License Amendment Request on behalf of CCNPP. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other CCNPP employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Gr Gellrich.

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of St. Mary's, this 28th day of January, 2011.

JANET L. SCULLY NOTARY PUBLIC ST. MARY'S COUNTY, MD

WITNESS my Hand and Notarial Seal:

Janet L. Scully
Notary Public

My Commission Expires:

March 1, 2011
Date

GHG/PSF/bjd

Attachment: (1) Supplemental Information for Question #18

cc: D. V. Pickett, NRC
W. M. Dean, NRC
Resident Inspector, NRC
S. Gray, DNR

ATTACHMENT (1)

SUPPLEMENTAL INFORMATION FOR QUESTION #18

ATTACHMENT (1)

SUPPLEMENTAL INFORMATION FOR QUESTION #18

1. *The licensee has identified a reduction in time available for tripping Reactor Coolant Pumps (RCPs) when sub-cooling margin falls to < 20 degrees. Has the licensee identified and evaluated any other operator actions that are required, or are affected by the proposed LAR, including any effects on the time available for, or the time required, to perform operator actions?*

   No other new operator actions have been identified that are required by or affected by the proposed License Amendment Request (LAR). No other operator action times have been identified that are affected by the proposed LAR.
   If yes, describe and justify actions as feasible and reliable. N/A

2. *Has the licensee identified any required modifications to operator interfaces associated with the proposed LAR, such as:*

   A. *Emergency and abnormal operating procedures?*

      As previously noted, Emergency Operating Procedure (EOP)-0 is being modified, and the licensed operators have been trained on the new criteria for securing the RCPs and the associated time requirements. Operator response has been validated on the simulator. Operator response will continue to be validated as part of the continuing and initial Licensed Operator Training Programs.

   B. *Control Room controls, displays (including the safety parameter display system) and alarms?*

      No.

   C. *The Control Room plant reference simulator?*

      The action to trip the RCPs exists in EOP-0. The subcooled indication and associated alarms exists in the simulator/control room. Reactor coolant pump control hand switches are located on 1C06, in the Control Room. Back up means of securing RCPs are located on 1C19, in the Control Room. No changes to the Simulator/Control Room are required.

   D. *The operator training program?*

      A job/simulator performance measure is being established for this time critical action (turning off all RCPs based on subcooling) and this simulator/ job performance measure will be implemented independently of the formal Time Critical Action program. This simulator/job performance measure includes pass/fail criteria for training on the simulator. This criterion was developed using the Systematic Approach to Training process and the guidance of WCAP-16755, "Operator Time Critical Action Program Standard." The job/simulator performance measure will be incorporated into the job/simulator scenarios prior to operation of AREVA fuel in the reactor vessel.

   If yes, describe and justify acceptability. N/A

3. *Does the licensee intend to complete the modifications identified in Item 2 above (including the training of operators), prior to operation using AREVA fuel? If not, justify why this is acceptable.*

   No modifications are necessary for the operator to successfully secure RCP in response to a loss-of-coolant accident.

   The Operators will be trained on all requirements and procedure changes concerning the need to secure RCPs within four minutes of Reactor Coolant System subcooling falling below 20°F prior to operation of the core with new AREVA fuel. This modifies any previous responses that may have contained different criteria for securing the RCPs.