

Mark T. Finley
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750 East Pratt Street, Suite 1400
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10 CFR 50.4
10 CFR 52.79
10 CFR 2.390
10 CFR 50.54(hh)(2)
10 CFR 52.80(d)

October 26, 2012

UN#12-105

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 335, Large Area Fires

- References:
- 1) Surinder Arora (NRC) to Paul Infanger (UniStar Nuclear Energy), "NON-PUBLIC VERSION FINAL RAI 335 SPFT 6141," email dated February 14, 2012
 - 2) UniStar Nuclear Energy Letter UN#12-025, from Mark T. Finley to Document Control Desk, U.S. NRC, Response to Request for Additional Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI 335, Large Area Fires, dated March 12, 2012
 - 3) UniStar Nuclear Energy Letter UN#11-101, from Greg Gibson to Document Control Desk, U.S. NRC, Submittal of Guidance and Strategies for the Loss of Large Areas per 10 CFR 50.54(hh)(2) and 10 CFR 52.80(d), Calvert Cliffs Nuclear Power Plant, Unit 3, dated March 23, 2011
 - 4) UniStar Nuclear Energy Letter UN#11-214, from Greg Gibson to Document Control Desk, U.S. NRC, Submittal of Guidance and Strategies for the Loss of Large Areas (Redacted) per 10 CFR 50.54(hh)(2) and 10 CFR 52.80(d), Calvert Cliffs Nuclear Power Plant, Unit 3, dated July 26, 2011

Enclosures 1 and 2 to this letter contain Sensitive Unclassified Non-Safeguards Information (SUNSI). Upon separation from the attachment, this letter is decontrolled.

DO96
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- 5) UniStar Nuclear Energy Letter UN#12-043, from Greg Gibson to Document Control Desk, U.S. NRC, Response to Request for Additional Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI 335, Large Area Fires, dated May 31, 2012

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 14, 2012 (Reference 1). This RAI addresses the redacted version of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA), Revision 8, Part 11P, Mitigative Strategies Report (MSR), Loss of Large Area of the Plant Due to Explosions or Fire, Revision 0, in accordance with Title 10 of the Code of Federal Regulations, 50.54(hh)(2) and Part 50.80(d).

Reference 2 provided a response schedule for Questions 19.03-1 through 19.03-46. An updated response schedule for the RAI 335 questions is provided in the tabulation below, including the questions for which responses are provided in this letter:

RAI 335 – Response Schedule	
Question	UNE Response Date to NRC
19.03-3, 19.03-10, 19.03-27, and 19.03-39	May 31, 2012 (Reference 5)
19.03-1, 19.03-2, 19.03-5, 19.03-6, 19.03-8, 19.03-11, 19.03-12, 19.03-20 through 19.03-23, 19.03-28, 19.03-30, 19.03-36, 19.03-37, 19.03-40 through 19.03-43, and 19.03-45	October 26, 2012 (this letter)
19.03-13, 19.03-16a, 19.03-35, 19.03-38, 19.03-44	December 20, 2012
19.03-4, 19.03-7, 19.03-9, 19.03-14, 19.03-15, 19.03-16b, 19.03-17, 19.03-18, 19.03-19, 19.03-24, 19.03-25, 19.03-26, 19.03-29, 19.03-31, 19.03-32, 19.03-33, 19.03-34, and 19.03-46	April 30, 2013

The RAI 335 Question 19.03-1, 19.03-2, 19.03-5, 19.03-6, 19.03-8, 19.03-11, 19.03-12, 19.03-20, 19.03-21, 19.03-22, 19.03-23, 19.03-28, 19.03-30, 19.03-36, 19.03-37, 19.03-40, 19.03-41, 19.03-42, 19.03-43, and 19.03-45 responses provided in Enclosure 1 include changes to the redacted MSR, which is located in Part 11P of the COLA. The COLA Impact changes provided with these responses supersede the corresponding sections of the MSR as provided in References 3 and 4. Enclosure 4 provides a table of changes to the CCNPP Unit 3 COLA associated with this RAI 335 response.

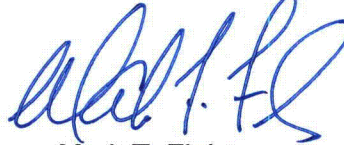
This letter also provides corrections to the MSR as described in Enclosure 2.

Our response does not include any new regulatory commitments. This letter does not contain any proprietary information. However, it does contain Sensitive Unclassified Non-Safeguards Information (SUNSI) that UniStar requests be withheld from the public. We request that it be withheld from public disclosure in accordance with 10 CFR 2.390(d)(1). An affidavit providing the basis for this request for withholding is provided in Enclosure 3.

If there are any questions regarding this transmittal, please contact me at (410) 369-1907 or Mr. Wayne A. Massie at (410) 369-1910.

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

Executed on October 26, 2012



Mark T. Finley

- Enclosures:
- 1) Responses to NRC Request for Additional Information RAI No. 335, Questions 19.03-1, 19.03-2, 19.03-5, 19.03-6, 19.03-8, 19.03-11, 19.03-12, 19.03-20, 19.03-21, 19.03-22, 19.03-23, 19.03-28, 19.03-30, 19.03-36, 19.03-37, 19.03-40, 19.03-41, 19.03-42, 19.03-43, and 19.03-45, Large Area Fires, Calvert Cliffs Nuclear Power Plant, Unit 3
 - 2) Corrections to the MSR, Loss of Large Area of the Plant Due to Explosions or Fire, Revision 0
 - 3) Affidavit Requesting the Withholding of Enclosures 1 and 2 from Public Disclosure in Accordance with 10 CFR 2.390
 - 4) Table of Changes to CCNPP Unit 3 COLA Associated with Response to RAI No. 335

cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch
Laura Quinn-Willingham, NRC Environmental Project Manager, U.S. EPR COL Application
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application, (w/o enclosures)
Patrica Holahan, Acting Deputy Regional Administrator, NRC Region II, (w/o enclosures)
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2,
David Lew, Deputy Regional Administrator, NRC Region I (w/o enclosures)

UN#12-105

Enclosure 3

**Affidavit Requesting the Withholding of Enclosures 1 and 2 from
Public Disclosure in Accordance with 10 CFR 2.390**

Affidavit of Mark T. Finley
(Page 1 of 2)

Mark T. Finley, being duly sworn, hereby deposes and states as follows:

1. My name is Mark T. Finley. I am the Senior Vice-President Regulatory Affairs and Engineering, 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#12-105, "UniStar Nuclear Energy, NRC Docket No. 52-016, Response to Request for Additional Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI 335, Large Area Fires," hereafter referred to as the Commercial Information in accordance with 10 CFR 2.390(d), from public disclosure in accordance with the Nuclear Regulatory Commission (NRC) regulations appearing at 10 CFR 2.390(d)(1).
3. Commercial Information is being submitted as confidential information as part of Enclosures 1 and 2 to UniStar letter UN#12-105 from Mark T. Finley to the NRC Document Control Desk.
4. The Commercial Information includes information related to physical protection of the proposed U.S. EPR nuclear power plant at the Calvert Cliffs Nuclear Power Plant, Unit 3 Site (i.e., CCNPP Unit 3). In accordance with RIS-2005-26, "CONTROL OF SENSITIVE UNCLASSIFIED NONSAFEGUARDS INFORMATION RELATED TO NUCLEAR POWER REACTORS," this information can be withheld from public disclosure as proprietary information:
5. The Commercial Information was prepared with the explicit understanding that the information itself would be treated as confidential, and is of a type customarily withheld from disclosure by UniStar. 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 Commercial Information has not otherwise been knowingly made available in any public source.
6. Information related to physical protection by its nature is treated as confidential. The specific physical protection details in the Commercial Information have not been publicly released for the reasons set forth above. Accordingly, withholding the Commercial Information from disclosure will not adversely affect the public.

Affidavit of Mark T. Finley
(Page 2 of 2)

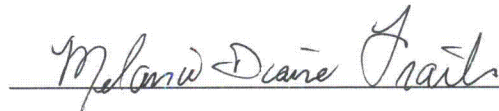
7. Enclosure 1 of letter UN#12-105 contains Sensitive Unclassified Non-Safeguards Information (SUNSI). Upon separation from Enclosures 1 and 2, this letter is decontrolled.

Further Affiant sayeth not.

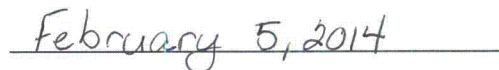


Mark T. Finley
Senior Vice-President Regulatory Affairs
& Engineering
UniStar Nuclear Energy, LLC

Subscribed and sworn to before me,
Notary Public, this 26th day of October 2012:



My Commission expires:



MELANIE DIANE FRAILER
NOTARY PUBLIC
ANNE ARUNDEL COUNTY, MARYLAND
MY COMMISSION EXPIRES 2/5/2014



UN#12-105

Enclosure 4

Table of Changes to CCNPP Unit 3 COLA Associated with Response to RAI No. 335

Table of Changes to CCNPP Unit 3 COLA Associated with Response to RAI No. 335

Change ID #	Subsection	Type of Change	Description of Change
Part 8 – Withheld			
CC3-12-0113	5.1.1 and 5.1.3	Incorporate COLA markups associated with the RAI 335 Question 19.03-10 and 19.03-39 responses. The section 5.1.1 and 5.1.3 changes to the MSR do not constitute or involve Safeguards Information.	<p>The RAI 335 Question 19.03-10 and 19.03-39 responses include changes to the Mitigative Strategies Report (MSR) which is a COLA Part 8 document. The changes provided with the RAI 335 Question 19.03-10 and 19.03-39 responses supersede the corresponding sections of the MSR as provided in UniStar Nuclear Energy (UNE) Letter UN#11-101, from Greg Gibson to Document Control Desk, U.S. NRC, Submittal of Guidance and Strategies for the Loss of Large Areas per 10 CFR 50.54(hh)(2) and 10 CFR 52.80(d), Calvert Cliffs Nuclear Power Plant Unit 3,” dated March 23, 2011.</p> <p>UNE letter UN#11-101, dated March 23, 2011, provided the unredacted MSR in a Safeguards Information (SGI) submittal. The redacted MSR was subsequently transmitted to the NRC by UNE letter UN#11-214, dated July 26, 2011, which is mentioned below in association with the COLA Part 9 changes.</p>
Part 9 – Proprietary and Sensitive Unclassified Non-Safeguards Information			
CC3-12-0113	Section 1.6	Incorporate COLA markups associated with the RAI 335 Question 19.03-10 and 19.03-39 responses. The section 5.1.1 and 5.1.3 changes to the MSR are Security-Related Information and do not constitute or involve Safeguards Information.	<p>The RAI 335 Question 19.03-10 and 19.03-39 responses include changes to the redacted MSR which is located in Part 9 and Part 11P of the COLA. The changes provided with the RAI 335 Question 19.03-10 and 19.03-39 responses supersede the corresponding sections of the MSR as provided in UniStar Nuclear Energy Letter UN#11-214, from Greg Gibson to Document Control Desk, U.S. NRC, Submittal of Guidance and Strategies for the Loss of Large Areas (Redacted) per 10 CFR 50.54(hh)(2) and 10 CFR 52.80(d), Calvert Cliffs Nuclear Power Plant Unit 3,” dated July 26, 2011.</p> <p>Text is appended to MSR Section 5.1.1 to further substantiate compliance with NEI 06-12, Section 2.3.1 guidance. Text inserted into MSR Section 5.1.3 to provide fire water storage tank refill information.</p>
Part 11P – Mitigative Strategies Report			
CC3-12-0113	5.1.1 and 5.1.3	Same as above for Part 9 (Section 1.6)	Same as above for Part 9 (Section 1.6)

Change ID #	Subsection	Type of Change	Description of Change
CC3-12-105		Incorporate COLA markups associated with the RAI 335 Question 19.03-1, 19.03-2, 19.03-5, 19.03-6, 19.03-8, 19.03-11, 19.03-12, 19.03-20, 19.03-21, 19.03-22, 19.03-23, 19.03-28, 19.03-30, 19.03-36, 19.03-37, 19.03-40, 19.03-41, 19.03-42, 19.03-43, and 19.03-45 responses. The changes to the MSR are Security-Related Information and do not constitute or involve Safeguards Information.	The RAI 335 Question 19.03-1, 19.03-2, 19.03-5, 19.03-6, 19.03-8, 19.03-11, 19.03-12, 19.03-20, 19.03-21, 19.03-22, 19.03-23, 19.03-28, 19.03-30, 19.03-36, 19.03-37, 19.03-40, 19.03-41, 19.03-42, 19.03-43, and 19.03-45 responses include changes to the redacted MSR which is located in Part 9 and Part 11P of the COLA. The changes provided with the RAI 335 Question 19.03-1, 19.03-2, 19.03-5, 19.03-6, 19.03-8, 19.03-11, 19.03-12, 19.03-20, 19.03-21, 19.03-22, 19.03-23, 19.03-28, 19.03-30, 19.03-36, 19.03-37, 19.03-40, 19.03-41, 19.03-42, 19.03-43, and 19.03-45 responses supersede the corresponding sections of the MSR as provided in UniStar Nuclear Energy Letter UN#11-214, from Greg Gibson to Document Control Desk, U.S. NRC, Submittal of Guidance and Strategies for the Loss of Large Areas (Redacted) per 10 CFR 50.54(hh)(2) and 10 CFR 52.80(d), Calvert Cliffs Nuclear Power Plant Unit 3," dated July 26, 2011.