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10 CFR 50.4  
10 CFR 52.79

May 27, 2014

UN#14-049

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

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016  
Supplemental Response to Request for Additional Information for the  
Calvert Cliffs Nuclear Power Plant, Unit 3,  
Air Conformity Report, Revision 4

Reference: UniStar Nuclear Energy Letter UN#11-263, from Greg Gibson to Document Control  
Desk, U.S. NRC, Calvert Cliffs Nuclear Power Plant, Unit 3, Calvert County,  
Maryland, Air Conformity Report, Revision 3, dated September 30, 2011

This letter transmits Revision 4 of "NO<sub>x</sub> and VOC Emissions from Construction Activities and Air Conformity Applicability, Calvert Cliffs Unit 3," (Enclosure 2). Revision 3 of this report was transmitted by the referenced letter. Enclosure 1 provides a brief explanation of the basis for preparing the revision and includes revised Combined License Application (COLA) content. A Licensing Basis Document Change Request has been initiated to incorporate these changes into a future revision of the COLA.

Enclosure 3 provides a Table of Changes to the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 COLA associated with the preparation of Revision 4 of the report, "NO<sub>x</sub> and VOC Emissions from Construction Activities and Air Conformity Applicability, Calvert Cliffs Unit 3."

This submittal does not include any new regulatory commitments. This letter, and its enclosures, do not contain any sensitive or proprietary information.

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LRO

If there are any questions regarding this transmittal, please contact me at (410) 369-1987 or Mr. Mark Finley at (410) 369-1907.

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

Executed on May 27, 2014



Paul Infanger

- Enclosures:
- 1) Basis for the Preparation of, "NO<sub>x</sub> and VOC Emissions from Construction Activities and Air Conformity Applicability, Calvert Cliffs Unit 3," Revision 4, Calvert Cliffs Nuclear Power Plant, Unit 3
  - 2) NO<sub>x</sub> and VOC Emissions from Construction Activities and Air Conformity Applicability, Calvert Cliffs Unit 3, Rev. 4, April 2014
  - 3) Table of Changes to CCNPP Unit 3 COLA Associated with the Preparation of, "NO<sub>x</sub> and VOC Emissions from Construction Activities and Air Conformity Applicability, Calvert Cliffs Unit 3," Revision 4, Calvert Cliffs Nuclear Power Plant, Unit 3

cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch  
Tomeka Terry, NRC Environmental Project Manager, U.S. EPR COL Application  
Patricia 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)  
Kathy Anderson – US Army Corps of Engineers  
Woody Francis - US Army Corps of Engineers

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**Enclosure 1**

**Basis for the Preparation of, "NO<sub>x</sub> and VOC Emissions from Construction Activities and Air Conformity Applicability, Calvert Cliffs Unit 3," Revision 4, Calvert Cliffs Nuclear Power Plant, Unit 3**

**Basis for the Preparation of, “NO<sub>x</sub> and VOC Emissions from Construction Activities and Air Conformity Applicability, Calvert Cliffs Unit 3,” Revision 4, Calvert Cliffs Nuclear Power Plant, Unit 3**

Revision 4 was prepared to include U.S. Army Corps of Engineers (USACE) activities for tidal and non-tidal mitigation that were not addressed in Rev. 3. Revision 3 of this Air Conformity Report was transmitted by letter dated September 30, 2011<sup>1</sup>. No revisions to previously submitted NRC-related construction estimates provided in Revision 3 of the report are made in this revision.

**COLA Impact**

CCNPP Unit 3 COLA FSAR Section 2.3.2.1.6 has been revised has follows:

**2.3.2.1.6 Air Quality**

Based on EPA data, Calvert County, Maryland, is in attainment for all the National Ambient Air Quality Standards (NAAQS) except for the 8 hour ozone standard (EPA, 2009b) as of October 8, 2009. Attainment means that the air quality is better than the standard. The 8 hour ozone standard is 0.08 ppm and attainment is determined by whether the 3 year average of the fourth-highest daily maximum 8 hour average ozone concentrations measured at each monitor within an area over each year exceeds the standard. From Figure 2.3-6 it can be seen that the fourth-highest, 8 hour average ozone concentration for Calvert County during 2006 is greater than 0.08 ppm and less than or equal to 1.0 ppm. Nonattainment of the 8 hour ozone standard is due to its proximity to Washington, D.C. A nonattainment designation requires a state plan to be sent to the EPA describing how the area will implement air quality improvements. The NAAQS (EPA, 2007c) are presented in Table 2.3-1. Note that the Maryland Department of the Environment reported that ground-level ozone levels have continued to show significant improvements since the early 1990's (MDE, 2006).

Calvert County is part of the Southern Maryland Intrastate Air Quality Control Region (AQCR), as designated in 40 CFR 81.156 (CFR, 2009a). The attainment status of the Southern Maryland Intrastate AQCR with regard to national ambient air quality standards is listed as being better than national standards for total suspended particulates, sulfur dioxide, and nitrogen dioxide, and unclassifiable/attainment for carbon monoxide, PM<sub>2.5</sub> (particulate matter with diameter less than 2.5 microns), and designated as a moderate nonattainment area for the 8 hour ozone standard (CFR, 2009b).

Updated construction emission calculations (AECOM, ~~2009~~2014) show that estimate NO<sub>x</sub> emissions will be greater than the applicable threshold for some years of construction.

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<sup>1</sup>UniStar Nuclear Energy Letter UN#11-263, from Greg Gibson to Document Control Desk, U.S. NRC, Calvert Cliffs Nuclear Power Plant, Unit 3, Calvert County, Maryland, Air Conformity Report, Revision 3, dated September 30, 2011

CCNPP Unit 3 COLA FSAR Section 2.3.2.4 has been revised has follows:

**2.3.2.4       References**

**AECOM, ~~2009~~2014.** "NOX and VOC Emissions from Construction Activities and Air Conformity Applicability Calvert Cliffs Unit 3", ~~December 2009~~April 2014.