



**Exelon Generation®**

**George Gellrich**  
Site Vice President

Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, MD 20657

410 495 5200 Office  
717 497 3463 Mobile  
www.exeloncorp.com

george.gellrich@exeloncorp.com

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November 17, 2015

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

Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2  
Renewed Facility Operating License Nos. DPR-53 and DPR-69  
NRC Docket Nos. 50-317 and 50-318

Subject: Calvert Cliffs GSI-191 Resolution Plan

- References:
1. Letter from G. H. Gellrich (CCNPP) to Document Control Desk (NRC), dated May 16, 2013, Calvert Cliffs GSI-191 Resolution Plan
  2. Nuclear Regulatory Commission Staff Requirements, dated December 14, 2012, SECY-12-0093, Closure Options for Generic Safety Issue-191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance

In Reference 1, we described our plan for resolving Generic Safety Issue 191 (GSI-191) and responding to Generic Letter 2004-02. The plan described was a parallel deterministic approach with refined chemical effects testing and the risk-informed resolution approach, both consistent with Option 2 as identified in SECY-12-0093, Reference 2. Also in Reference 1 we made five commitments consistent with our parallel approaches.

We have now abandoned the deterministic approach with refined chemical effects testing and are following the risk-informed approach to resolve GSI-191 and respond to Generic Letter 2004-02. Therefore, we are revising the commitments made in Reference 1. This letter contains our revised regulatory commitments as listed in Attachment (1).

Should you have questions regarding this matter, please contact Mr. Larry D. Smith at (410) 495-5219.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on November 17, 2015.

Respectfully,



George H. Gellrich  
Site Vice President

GHG/KLG/bjm

Attachment: (1) Regulatory Commitments

cc: NRC Project Manager, Calvert Cliffs  
NRC Regional Administrator, Region I

NRC Resident Inspector, Calvert Cliffs  
S. Gray, MD-DNR

**ATTACHMENT (1)**

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**LIST OF REGULATORY COMMITMENTS**

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**ATTACHMENT (1)**  
**LIST OF REGULATORY COMMITMENTS**

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The table below lists the actions committed to in this letter. Any other statements in this letter are provided for information purposes and are not considered to be regulatory commitments.

<b>Regulatory Commitment</b>	<b>Date</b>
Calvert Cliffs will complete any necessary insulation replacements or remediation, or other identified plant changes no later than the 2018 refueling outage for Calvert Cliffs Unit 1. This completion date is predicated on the successful completion of our Option 2 approach.	5/1/2018 (Unit 1)
Calvert Cliffs will complete any necessary insulation replacements or remediation, or other identified plant changes no later than the 2019 refueling outage for Calvert Cliffs Unit 2. This completion date is predicated on the successful completion of our Option 2 approach.	5/1/2019 (Unit 2)
Calvert Cliffs will establish plant-specific in-vessel debris limits for Calvert Cliffs Units 1 and 2 in accordance with the approved WCAP-16793 methodology. The plant-specific in-vessel debris limits will be submitted with the Calvert Cliffs final submittal for GL 2004-02.	12/31/2016
If the Calvert Cliff's Option 2b risk-informed approach is not successful for resolving the GSI-191 issue, then Calvert Cliffs will submit a new resolution plan.	12/31/2016
If the Calvert Cliff's Option 2b risk-informed approach is successful for resolving the GSI-191 issue, then Calvert Cliffs will submit a final updated supplemental response to support closure of GL 2004-02 for Calvert Cliffs Units 1 and 2 by December 31, 2016.	12/31/2016