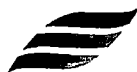


~~Exelon Confidential/Proprietary Information Withhold Under 10 CFR 2.390~~
Attachments 3 through 7 contain Exelon ~~Confidential/Proprietary Information~~;
upon separation this cover letter and Attachments 1 and 2 are decontrolled.



Exelon Generation.

10 CFR 50, Appendix E
10 CFR 50.54(q)(5)
10 CFR 50.4
10 CFR 72.44(f)

December 3, 2015

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

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

Calvert Cliffs Independent Spent Fuel Storage Installation
Materials License No. SNM-2505
NRC Docket No. 72-8

Subject: Exelon Radiological Emergency Plan Implementing Procedure Revision

In accordance with 10 CFR 50, Appendix E, Section V, "Implementing Procedures," Exelon Generation Company, LLC (EGC) is submitting the Emergency Plan implementing procedure revisions identified in the table below for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs).

| Procedure No. | Revision | Title |
|---------------|----------|--|
| ERPIP-800 | 3 | <i>Core Damage Assessment</i> |
| ERPIP-801 | 3 | <i>Core Damage Assessment Using Containment Radiation Dose Rates</i> |
| ERPIP-802 | 4 | <i>Core Damage Assessment Using Core Exit Thermocouples</i> |
| ERPIP-803 | 4 | <i>Core Damage Assessment Using Hydrogen</i> |
| ERPIP-804 | 4 | <i>Core Damage Assessment Using Radiological Analysis of Samples</i> |

The changes to the Emergency Plan implementing procedures cited were evaluated under the requirements of 10 CFR 50.54(q) and were determined not to result in a reduction in the effectiveness of the Emergency Plan for Calvert Cliffs. This notification is being submitted within 30 days of implementation of the changes as required by 10 CFR 50, Appendix E. The changes continue to meet the applicable planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

Furthermore, Attachments 3 through 7 of this letter are proprietary and confidential and contain trade secrets and commercial or financial information. EGC maintains this information on a confidential basis and protects it from disclosure to the general public or unauthorized

~~Exelon Confidential/Proprietary Information Withhold Under 10 CFR 2.390~~
Attachment 3 through 7 contain Exelon ~~Confidential/Proprietary Information~~;
upon separation this cover letter and Attachments 1 and 2 are decontrolled.

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individuals. EGC requests that Attachments 3 through 7 be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4), and has attached an affidavit for this purpose (Attachment 2). However, if the NRC intends to place any of this information in the Public Document Room or on the Agencywide Documents Access and Management System or produce it in response to a Freedom of Information Act (FOIA) request, EGC requests the opportunity to redact the materials consistent with established FOIA exemptions and precedent.

In addition, as required by 10 CFR 50.54(q)(5), this submittal includes a summary analysis of the changes to the Emergency Plan implementing procedures (Attachment 1).

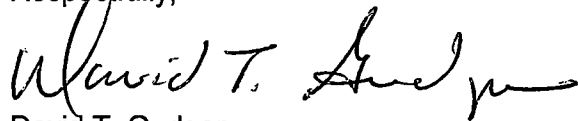
This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the Emergency Plan, the licensee shall submit a report containing a description of the changes to the Director, Division of Spent Fuel Storage and Transportation.

A copy of the revised Emergency Plan implementing procedures and supporting change summary analysis are included in the cited attachments to this letter.

There are no regulatory commitments in this submittal.

If you have any questions or require additional information, please contact Richard Gropp at (610) 765-5557.

Respectfully,



David T. Gudger
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachments:

1. 10 CFR 50.54(q)(5) Procedure Change Summary Analysis
2. Affidavit
3. ERPIP-800, Revision 3, "*Core Damage Assessment*"
4. ERPIP-801, Revision 3, "*Core Damage Assessment Using Containment Radiation Dose Rates*"
5. ERPIP-802, Revision 4, "*Core Damage Assessment Using Core Exit Thermocouples*"
6. ERPIP-803, Revision 4, "*Core Damage Assessment Using Hydrogen*"
7. ERPIP-804, Revision 4, "*Core Damage Assessment Using Radiological Analysis of Samples*"

cc: w/ Attachments 1 and 2 only
Regional Administrator - NRC Region I
Director, NRC Division of Spent Fuel Storage and Transportation, ONMSS
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Station
NRC Project Manager, NRR - Calvert Cliffs Nuclear Power Station
S. T. Gray, State of Maryland

ATTACHMENT 1

10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Attachment 1
10 CFR 50.54(q)(5) Procedure Change Summary Analysis

Page 1 of 2

Procedures/Titles

Exelon Generation Company, LLC (EGC) is submitting the following Emergency Plan implementing procedure revisions for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs):

- ERPIP-800, Revision 3, "*Core Damage Assessment*"
- ERPIP-801, Revision 3, "*Core Damage Assessment Using Containment Radiation Dose Rates*"
- ERPIP-802, Revision 4, "*Core Damage Assessment Using Core Exit Thermocouples*"
- ERPIP-803, Revision 4, "*Core Damage Assessment Using Hydrogen*"
- ERPIP-804, Revision 4, "*Core Damage Assessment Using Radiological Analysis of Samples*"

These procedures contain *Exelon Confidential/Proprietary Information* and EGC is requesting that they be withheld from public disclosure pursuant to 10 CFR 2.390.

Description of Procedures

The purpose of Core Damage Assessment implementing procedures cited is to provide guidance for determining the extent of reactor core damage during high heat conditions without adequate core cooling and/or core inventory. Specifically, the implementing procedures noted provide guidance for the Thermal Hydraulic Engineers to evaluate reactor core damage using various methods such as radiation dose, core exit thermocouples temperature, hydrogen accumulation and, analysis of radiological samples.

Description of Changes

The changes to the implementing procedures identified above primarily involve reformatting the procedures into the EGC formatting model to support integration. Specifically, the changes involve taking the content of the Calvert Cliffs procedures noted and placing the same content in sections of the procedures that represent the EGC model. The changes are considered administrative in nature. The methodologies of determining core damage were not altered.

Description of How the Changes Still Complies with Regulations

10 CFR 50.47(b)(9) requires that adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use. This planning function ensures methods, systems, and equipment for assessment of radioactive releases is in use.

These procedures implement this standard in part by providing a means to assess core damage in the event of a nuclear accident. The changes do not impact this planning standard or planning function. The changes to the listed Core Damage Assessment procedures are administrative in nature, in that Calvert Cliffs is transitioning to the EGC procedure formatting model. The changes to the procedures primarily involve revisions to section titles and adding new sections. These changes have no impact on program requirements since the technical content of the procedures remains unchanged.

Attachment 1
10 CFR 50.54(g)(5) Procedure Change Summary Analysis

Page 2 of 2

Description of Why the Changes are Not a Reduction in Effectiveness (RIE)

The revised procedures remain consistent with the applicable Emergency Planning requirements specified in 10 CFR 50.47(b) and guidance of NUREG-0654. The revisions to the procedures do not alter the capability of the Emergency Response Organization (ERO) to implement required Emergency Plan functions, and do not affect the timeliness of the performance of these functions. Therefore, the changes do not result in a reduction in the effectiveness of the Emergency Plan for Calvert Cliffs.

ATTACHMENT 2

Radiological Emergency Plan Implementing Procedure Revision

Affidavit

AFFIDAVIT OF DAVID T. GUDGER

DOCKET NOS. 50-317, 50-318, and 72-8

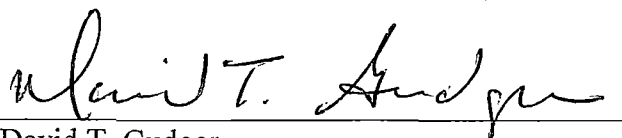
I, David T. Gudger, Manager, Licensing and Regulatory Affairs, Exelon Generation Company, LLC, do hereby affirm and state:

1. I am Manager, Licensing and Regulatory Affairs for Exelon Generation Company, LLC (EGC), and I am authorized to execute this affidavit on behalf of EGC.
2. I am further authorized to review the documents sought to be withheld from public disclosure in connection with submittals to the Nuclear Regulatory Commission ("NRC"):
 - ERPIP-800, Revision 3, "Core Damage Assessment"
 - ERPIP-801, Revision 3, "Core Damage Assessment Using Containment Radiation Dose Rates"
 - ERPIP-802, Revision 4, "Core Damage Assessment Using Core Exit Thermocouples"
 - ERPIP-803, Revision 4, "Core Damage Assessment Using Hydrogen"
 - ERPIP-804, Revision 4, "Core Damage Assessment Using Radiological Analysis of Samples"
3. I am also authorized to apply to the NRC for the withholding of the aforementioned documents from public disclosure under 10 C.F.R. §§ 2.390(a)(4) and 9.17(a)(4) on the grounds that the documents contain privileged or confidential or proprietary commercial information. The documents EGC seeks to withhold from public disclosure have been marked "Proprietary" and are summarized in the attachment to my Affidavit.
4. On behalf of EGC, I request that the document marked by EGC as "Proprietary" and described in the attached list (Appendix 1) be withheld, in their entirety, by the NRC from public disclosure.
5. In making this application for withholding of proprietary and confidential information of which EGC is the owner, EGC relies on 10 C.F.R. § 2.390(a)(4) and 10 C.F.R. 9.17(a)(4). The proprietary documents contain privileged or confidential or proprietary commercial information.
6. The proprietary information described in Appendix 1 should be withheld from disclosure by the NRC pursuant to the policy reflected in 10 C.F.R. § 2.390(a)(4), and for the following reasons to be considered pursuant to 10 CFR § 2.390(b)(4):
 - i.. The documents are each either a policy, procedure, process, technical requirements document, or other document that forms part of the Exelon Nuclear Management Model ("ENMM").
 - ii. The ENMM is a set of confidential policies and procedures that enable EGC to consistently achieve excellence in all key dimensions of its business. It documents proven ways of achieving excellence and defines how EGC executes and manages performance and assesses results. EGC expended significant resources, in terms of

time and money, to develop, implement, and update the ENMM. EGC derives economic benefit from the ENMM in terms of increased efficiency and improved results as well as revenue generated from EGC's sale or licensing of the ENMM.

- iii. The documents are now, and have been, held in confidence by EGC. EGC does not customarily make these documents available to the public. EGC has not authorized making the documents available through public sources.
 - iv. EGC is providing the NRC with the documents and information in confidence.
 - v. Economic harm would come to EGC with the publication of the individual documents that form the ENMM, as it would reduce or eliminate the need for any third party to purchase or license the ENMM from EGC, and would reduce the competitive position of EGC based on the benefits that the ENMM provides to EGC in the management of its own nuclear plants. The ENMM is considered by EGC to be a very valuable part of our intellectual property and it would be very difficult, costly and time-consuming for another to duplicate it without access to these documents.
7. EGC requests that each of the documents listed in Appendix 1 be withheld from public disclosure based on the reasons stated above in paragraph 6.i. through 6.v.

I declare under penalty of perjury that the foregoing affidavit and statements therein are true and correct to the best of my knowledge, information, and belief.



David T. Gudger
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Date: December 3, 2015

Appendix 1: Information that Should Be Withheld from Public Disclosure

| Date or Revision | Description of Document | Reason(s) to Withhold |
|------------------|-------------------------|---|
| Revision 3 | ERPIP-800 | Entire document exempt from disclosure under 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) based on paragraph 6 of the affidavit to which this Appendix 1 is attached. |
| Revision 3 | ERPIP-801 | Entire document exempt from disclosure under 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) based on paragraph 6 of the affidavit to which this Appendix 1 is attached. |
| Revision 4 | ERPIP-802 | Entire document exempt from disclosure under 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) based on paragraph 6 of the affidavit to which this Appendix 1 is attached. |
| Revision 4 | ERPIP-803 | Entire document exempt from disclosure under 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) based on paragraph 6 of the affidavit to which this Appendix 1 is attached. |
| Revision 4 | ERPIP-804 | Entire document exempt from disclosure under 10 C.F.R. § 2.390(a)(4) and 9.17(a)(4) based on paragraph 6 of the affidavit to which this Appendix 1 is attached. |