



Exelon Generation®

10 CFR 50.54(q)(5)  
10 CFR 50.4  
10 CFR 72.44(f)

February 11, 2016

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 50.4(b)(5), "Emergency plan and related submissions," Exelon Generation Company, LLC (EGC) is submitting the Emergency Plan implementing procedure revision identified in the table below for Calvert Cliffs Nuclear Power Plants (Calvert Cliffs).

Procedure No.	Revision	Title
ERPIP-3.0	05901	<i>Immediate Actions</i>

The changes to the Emergency Plan implementing procedure 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 50.4(b)(5). The changes continue to meet the applicable planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

Furthermore, Attachment 3 of this letter is proprietary and confidential and contains 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 individuals. EGC requests that Attachment 3 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. The procedure included

AX45  
NM5524  
NRR  
NM55

materials consistent with established FOIA exemptions and precedent. The procedure included in Attachment 2 also contains *SUNSI Security-Related Information* and the pages have been marked "*Security-Related Information - Withhold Under 10 CFR 2.390*," as appropriate.

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).

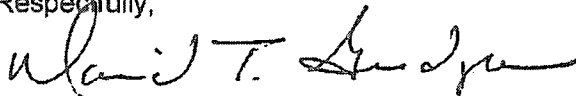
This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the Emergency Plan, the licensee shall submit a report containing a description of the changes to the Director, Division of Spent Fuel Storage 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-3.0, Revision 05901, "*Immediate Actions*" (SUNSI)

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**

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

**Procedures/Titles**

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

- ERPIP-3.0, Revision 05091, "*Immediate Actions*"

This procedure contains *Security-Related (SUNSI)* and *Exelon Confidential/Proprietary Information* and EGC is requesting that the procedure be withheld from public disclosure pursuant to 10 CFR 2.390.

**Description of Procedures**

The Emergency Plan implementing procedure cited above for Calvert Cliffs provides guidance to aid the Shift Emergency Director during a Security Event.

**Description of Changes**

This procedure was revised to update the contact information and guidance in the event site medical cannot be reached during a personnel emergency. The changes are considered administrative in nature.

**Description of How the Changes Still Complies with Regulations**

The revision to the procedure continues to satisfy the applicable Emergency Planning requirements established in 10 CFR 50.54(b)(10) as well as the Program Element guidance of NUREG-0654, Section II.J.

The change to update the contact information and guidance in the event site medical cannot be reached during a personnel emergency does not alter the assigned responsibilities and functions and does not result in a reduction of effectiveness of the Emergency Plan for Calvert Cliffs.

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

The revised procedure remains consistent with the requirements of the Emergency Planning requirements specified in 10 CFR 50.54(b)(10) as well as the Program Element guidance of NUREG-0654, Section II.J. This revision to the procedure does not alter the capability of the Emergency Response Organization (ERO) to implement required Emergency Plan functions, and does not affect the timeliness of the performance of these functions. Therefore, the change does not result in a reduction in the effectiveness of the Emergency Plan for Calvert Cliffs.

**ATTACHMENT 2**

**Affidavit**

**Radiological Emergency Plan Implementing Procedure Revision**

AFFIDAVIT OF DAVID T. GUDGER

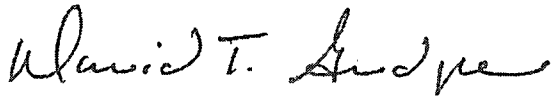
DOCKET NOS. 50-317, 50-318, and 72-8

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-3.0, Revision 05901, "Immediate Actions"
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 the document 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: February 11, 2016

## Appendix 1: Information that Should Be Withheld from Public Disclosure

Date or Revision	Description of Document	Reason(s) to Withhold
Revision 05901	ERPIP-3.0	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.