UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 12, 2017

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO)
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2; CALVERT CLIFFS INDEPENDENT SPENT FUEL STORAGE INSTALLATION; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; AND R. E. GINNA NUCLEAR POWER PLANT — REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST TO REVISE EMERGENCY ACTION LEVEL SCHEMES (CAC NOS. MF9836–MF9840, EPID L-2017-LLA-0237)

Dear Mr. Hanson:

By application dated May 31, 2017 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML17164A149), Exelon Generation Company, LLC (the licensee) submitted a license amendment request for Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant. The amendments would revise the emergency plans by changing the emergency action level schemes for these facilities. The proposed changes are based on the Nuclear Energy Institute's (NEI's) guidance in NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," which was endorsed by the U.S. Nuclear Regulatory Commission (NRC) by letter dated March 28, 2013 (ADAMS Accession No. ML12346A463).

The NRC staff has reviewed the application and determined that it needs additional information to complete its review. A response to the enclosed request for additional information is requested to be provided by January 31, 2017. This request was discussed with the licensee's staff on December 6, 2017. In addition, the response should identify any additional changes beyond the scope of this request and include any revisions to the emergency action level basis documents.

If you have any questions, please contact me at (301) 415-1380 or by email at blake.purnell@nrc.gov.

Sincerely,

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317, 50-318, 72-8, 50-220, 50-410, 72-1036, 50-244, and 72-67

cc: Listserv

REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO REVISE

EMERGENCY ACTION LEVEL SCHEMES

CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2

CALVERT CLIFFS INDEPENDENT SPENT FUEL STORAGE INSTALLATION

NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NOS. 50-317, 50-318, 72-8, 50-220, 50 410, 72 1036, 50-244, and 72 67

By application dated May 31, 2017 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML17164A149), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request for Calvert Cliffs Nuclear Power Plant (CCNPP), Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2 (NMP-1 and NMP-2, respectively); and R. E. Ginna Nuclear Power Plant (Ginna). The amendments would revise the emergency plans by changing the emergency action level (EAL) schemes for these facilities. The proposed changes are based on the Nuclear Energy Institute's (NEI's) guidance in NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors" (henceforth referred to as NEI 99-01), which was endorsed by the U.S. Nuclear Regulatory Commission (NRC) by letter dated March 28, 2013 (ADAMS Accession No. ML12346A463).

The NRC has reviewed the application and determined that the information below is needed to complete its review.

RAI-1 (CCNPP, Ginna, NMP-1, NMP-2)

Section 4.3, "Instrumentation Used for EALs," of NEI 99-01 states: "Scheme developers should ensure that specific values used as EAL setpoints are within the calibrated range of the referenced instrumentation. . . ."

Confirm that all setpoints and indications used in the CCNPP, Ginna, NMP-1, and NMP-2 EAL schemes are within the calibrated ranges of the stated instrumentation and that the resolution of the instrumentation is appropriate for the setpoint/indication.

RAI-2 (CCNPP, Ginna, NMP-1, NMP-2)

Section 4.7, "EAL/Threshold References to AOP [Abnormal Operating Procedure] and EOP [Emergency Operating Procedure] Setpoints/Criteria," of NEI 99-01 states:

> As reflected in the generic guidance, the criteria/values used in several EALs and fission product barrier thresholds may be drawn from a plant's AOPs and EOPs. This approach is intended to maintain good alignment between operational diagnoses and emergency classification assessments. Developers should verify that appropriate administrative controls are in place to ensure that a subsequent

change to an AOP or EOP is screened to determine if an evaluation pursuant to 10 CFR 50.54(q) is required.

Describe the administrative controls used at CCNPP, Ginna, NMP-1, and NMP-2 to ensure that a subsequent change to an AOP or EOP is screened to determine if an evaluation pursuant to 10 CFR 50.54(q) is required.

RAI-3 (CCNPP)

The proposed CCNPP EALs RG1, RS1, RA1, and RU1 include threshold values that use the sum of the Unit 1 and Unit 2 wide range noble gas monitor (WRNGM) readings. During the NRC staff's audit of calculations (ADAMS Accession No. ML17194B082), the staff noted that the flow rates for the CCNPP Unit 1 and Unit 2 main vent stacks are different, but the calculation used only the higher flow rate. This could result in unwarranted protective recommendations for CCNPP Unit 2.

Describe how the WRNGM threshold values for CCNPP EALs RG1, RS1, RA1, and RU1 were determined, including any differences between the parameters for Units 1 and 2. Justify the use of parameters for just one unit (e.g., stack flow rate) when the other unit is different. Explain how appropriate protective action recommendations can be made for each unit, if only the parameters for one unit are used in the calculation. Alternatively, provide revised EALs based on the specific parameters for each unit.

RAI-4 (NMP-1)

The proposed NMP-1 EALs RS1 and RG1 do not include an EAL based on site-specific instrumentation setpoints. However, the current NMP-1 EALs RU1, RA1, and RS1 include emergency condenser vent radiation monitor readings.

a. Identify the instrumentation available at NMP-1 to perform dose assessments for events that include site area emergency and general emergency classifications.

b. Explain why the instrumentation available to perform dose assessment at NMP-1 cannot be used to provide site-specific setpoints that could be used as threshold values for a site area emergency or a general emergency.

c. Provide justification that supports the removal of the emergency condenser vent radiation monitor readings from NMP-1 EALs RU1, RA1, and RS1. Alternatively, revise these EALs to include the emergency condenser vent radiation monitor readings consistent with the current NMP-1 EALs.

RAI-5 (CCNPP, Ginna, NMP-1, NMP-2)

The initiating condition for proposed CCNPP, Ginna, NMP-1, and NMP-2 EAL RU3 is "[r]eactor coolant activity greater than Technical Specification [TS] allowable limits." If certain conditions are met, then the TSs associated with these EALs require the reactor to be shut down within a specified time period (i.e., completion time). It is not clear if these completion times should be considered when determining if the initiating condition for these proposed EALs is met.

Clarify whether or not the TS completion times will be considered when assessing CCNPP, Ginna, NMP-1, and NMP-2 EAL RU3.

RAI-6 (CCNPP, Ginna, NMP-1, NMP-2)

The basis discussion for CCNPP, Ginna, NMP-1, and NMP-2 EAL RU3 states, in part: "Conditions that cause the specified monitor to alarm that are not related to fuel clad degradation should not result in the declaration of an Unusual Event."

Explain how a decision-maker can quickly and accurately determine whether or not a letdown radiation monitor alarm is due to clad damage. Alternatively, revise the EAL RU3 basis for each facility to remove the identification of fuel cladding degradation as a criterion.

RAI-7 (Ginna)

The proposed fission produce barrier EALs FC2.3 and RC2 for Ginna state that if Red Path conditions exist, then F-0.3 Heat Sink is used. However, NEI 99-01 states, in part:

> In accordance with EOPs, there may be unusual accident conditions during which operators intentionally reduce the heat removal capability of the steam generators; during these conditions, classification using threshold is not warranted.

While this guidance is included in the Ginna fission product barrier threshold basis discussions, it is not included in the relevant barrier thresholds. Explain why this condition is not included in the fission product barrier thresholds, as this could result in an inaccurate EAL declaration.

RAI-8 (Ginna)

The proposed fission product barrier thresholds for the containment radiation monitor readings in Ginna EALs FC3.1 and CT3 are substantially higher than the current Ginna EALs. The proposed Ginna EAL FC3.1 establishes a threshold of 700 roentgen per hour (R/hr) for the containment radiation monitor reading. Consistent with NEI 99-01, the basis for Ginna EAL FC3.1 states in part:

> The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into the containment, assuming that reactor coolant activity equals 300 µCi/gm [microcuries per gram] dose equivalent [iodine-131]. Reactor coolant activity above this level is greater than that expected for iodine spikes and corresponds to an approximate range of 2% to 5% fuel clad damage. Since this condition indicates that a significant amount of fuel clad damage has occurred, it represents a loss of the Fuel Clad Barrier.

However, the Ginna comparison matrix states that the FC3.1 threshold is based on 2 percent fuel clad damage.

Proposed Ginna EAL CT3 establishes a threshold of 7000 R/hr for the containment radiation monitor reading. Consistent with NEI 99-01, the basis for Ginna EAL CT3 states, in part: "The radiation monitor reading corresponds to an instantaneous release of all reactor coolant mass into containment, assuming that 20 percent of the fuel cladding has failed."

The NRC staff audited the licensee's calculations (EP-EAL-0512, Revision 1, and EP-EAL-0712, Revision 0) supporting the proposed Ginna fission product barrier EALs FC3.1 and CT3. EP-EAL-0712 indicates that 1 percent fuel clad damage results in an exposure rate of

600 R/hr and 300 µCi/gm dose equivalent iodine-131. However, EP-EAL-0512 indicates that 60 µCi/gm corresponds to 1 percent fuel clad failure.

Explain how the containment radiation monitor threshold values for Ginna EALs FC3.1 and CT3 were determined, and explain why these thresholds have substantially changed from the current Ginna EAL scheme. Justify the similar exposure rates for 1 percent and 2 percent fuel clad failures. Justify the substantially different activities in the calculations for dose equivalent iodine-131 for a 1 percent fuel clad failure.

RAI-9 (CCNPP)

The proposed fission product barrier thresholds for the containment radiation monitor readings in CCNPP EALs FC3.1, RC3, and CT3 are substantially higher than the current CCNPP EALs. The proposed value for CT3 is of particular concern as it could delay the declaration of a General Emergency classification.

Justify the proposed threshold values in CCNPP EALs FC3.1, RC3, and CT3, and explain why the proposed values have substantially changed from the current CCNPP EAL scheme. Explain how timely emergency classification can be made for each of these EALs. Alternatively, revise these EALs to be consistent with the current, NRC-approved EALs for CCNPP.

RAI-10 (NMP-1, NMP-2)

The proposed fission product barrier thresholds for the drywell radiation monitor reading in NMP-1 and NMP-2 EALS FC5, RC5, and CT5 are listed in the table below. Despite the substantial differences in size and design of NMP-1 and NMP-2, the three threshold values are the same. The current, NRC-approved threshold values for Oyster Creek Nuclear Generating Station and LaSalle County Station are also listed in the table for comparison.

Fission Product Barrier	NMP-1	Oyster Creek	NMP-2	LaSalle
FC5 Loss	1,800 R/hr	530 R/hr	1,800 R/hr	190 R/hr
RC5 Loss	100 R/hr	100 R/hr	100 R/hr	100 R/hr
CT5 Potential Loss	18,000 R/hr	1210 R/hr	18,000 R/hr	435 R/hr

NMP-1 and Oyster Creek are both General Electric Type 2 boiling-water reactors with Mark I containments. Although the proposed NMP-1 EAL RC5 threshold is identical to the Oyster Creek threshold, the proposed NMP-1 EALs FC5 and CT5 thresholds were substantially greater that the Oyster Creek thresholds.

NMP-2 and LaSalle are both General Electric Type 5 boiling-water reactors with Mark II containments. Although the proposed NMP-2 EAL RC5 threshold is identical to the LaSalle threshold, the proposed NMP-2 EALs FC5 and CT5 thresholds were substantially greater that the Oyster Creek thresholds.

In addition, the CG6 radiation values for core uncovery for NMP1, NMP2, Oyster Creek, and LaSalle are all 3 R/hr.

Explain why the thresholds for the drywell radiation monitor readings for NMP-1 and NMP-2 EALs FC5, RC5, and CT5 are identical when the plants are different in size and design. Explain why these thresholds are substantially different than similar facilities within the Exelon fleet, and explain why the proposed values have substantially changed from the current NMP-1 and NMP-2 EAL schemes.

RAI-11 (CCNPP, Ginna)

The proposed CCNPP and Ginna fission product barrier EALs RC1.2 and CT1 use a reactor coolant system (RCS) leak rate of 50 gallons per minute (gpm) as a threshold.

Explain how using a 50 gpm leak rate, instead of charging pump capacity, will permit timely event classification. This explanation should cover the operational significance of a 50 gpm leak rate, as well as what indication of a 50 gpm leak rate is readily available to the operators.

RAI-12 (NMP-1, NMP-2)

For the proposed NMP-1 and NMP-2 fission product barrier EAL RC4, the basis discussion regarding unisolable leakage states, in part: "Failure to isolate the leak, within 15 minutes or if known that the leak cannot be isolated within 15 minutes, from the start of the leak requires immediate classification." This statement is not consistent with NEI 99-01 which states, in part: "If it is determined that the ruptured line cannot be promptly isolated from the Control Room, the RCS barrier Loss threshold is met." The proposed wording could imply that operators have up to 15 minutes to attempt local isolation or to begin event classification.

Justify that the proposed wording will not cause inaccurate or delayed classifications of EAL RC4. Alternatively, revise the EAL RC4 basis to be consistent with the NEI 99-01 guidance.

RAI-13 (CCNPP, NMP-1, NMP-2)

The proposed CCNPP EAL CT4.3, NMP-1 EAL CT3.3, and NMP-2 EAL CT3.3 specify a threshold based on the internal design pressure for primary containment or the torus, as applicable. Each of these EALs are exceeded if the pressure exceeds the specified threshold and is rising. The NEI 99-01 guidance states that a containment pressure greater than a site-specific value should be used, but it does not include a rising pressure as part of the EAL criteria. The licensee stated that if the containment or torus pressure, as applicable, exceeds the design pressure, this represents a potential loss of the containment barrier.

The comparison matrices for NMP-1, and NMP-2 stated that: "The words 'and rising' were added to account for the momentary spike in pressure where pressure is now lowering, the risk of a potential loss of containment is no longer present. . . ."

Provide the basis for including the "and rising" pressure criteria in CCNPP EAL CT4.3, NMP-1 EAL CT3.3, and NMP-2 EAL CT3.3. Explain how a containment pressure in excess of the design pressure, with a decreasing pressure due to barrier degradation, would be appropriately assessed.

RAI-14 (Ginna, NMP-2)

For the 125-volt direct-current (VDC) buses, the proposed Ginna EALs CU3, MS2, and MG2 include a threshold of 110.6 VDC, which is higher than the 108-VDC threshold in the current Ginna EALs. Similarly, for the 125-VDC buses, the proposed NMP-2 EALs CU3, MS2, and MG2 include a threshold of 108 VDC, which is higher than the 105-VDC threshold in the current NMP-2 EALs.

Explain why the proposed voltage thresholds for the 125-VDC buses for Ginna and NMP-2 EALs CU3, MS2, and MG2 are different from the current NRC-approved EAL threshold values.

RAI-15 (CCNPP, Ginna, NMP-1, NMP-2)

The proposed EALs MU3, MA3, and MS3 use a power level of 5 percent for CCNPP, 5 percent for Ginna, 6 percent for NMP-1, and 4 percent for NMP-2 as an indication that the reactor is shutdown. The related guidance in NEI 99-01 states: "A reactor shutdown is determined in accordance with applicable Emergency Operating Procedure Criteria." NEI 99-01 is intended, in part, to align the classification of EALs MU3, MA3, and MS3 with site-specific EOP criteria for a successful reactor shutdown to provide decision-makers with consistent criteria.

The proposed criteria in EALs MU3, MA3, and MS3 does not clearly align with the EOP criteria. For example, CCNPP EOP-0, "Post-Trip Immediate Actions," uses a prompt drop in nuclear instrument power and a negative startup rate as indications of reactor shutdown.

Provide justification for using only the specified power levels in EALs MU3, MA5, and MS3 as the sole indication of a shutdown reactor, rather than the criteria in the EOP. Alternatively, provided revised EALs consistent with the EOP criteria.

RAI-16 (NMP-1)

The NMP-1 comparison matrix for proposed EAL MA4 states that an electrical load rejection of greater than 25 percent is not considered a significant transient at NMP-1 because the "generator voltage will respond to the event and very little if any change to the reactor plant will occur." However, the currently approved NMP-1 EAL SA5.1 includes an electric load rejection of 25 percent as a significant transient.

a. Explain in greater detail why an electrical load rejection of 25 percent is not considered as a significant transient.

b. Identify the load rejection value that would constitute a significant transient, and explain why it is not used in NMP-1 EAL MA4.

RAI-17 (CCNPP)

For CCNPP, explain why the proposed EAL Table M3, "Communications Capability," is different from Table C1, "Communications Capability." Alternatively, revise the tables to be consistent.

RAI-18 (NMP-1, NMP-2)

For NMP-1 and NMP-2, the tables for proposed EALs MU7 and CU4 include the control room installed satellite phone as a method of onsite communications. Typically, licensees do not have the ability to use satellite phones for routine operations.

Explain how the control room installed satellite phone can be used as a communication method for the performance of routine operations.

RAI-19 (CCNPP, Ginna)

NEI 99-01 provides a pressure-based indication for RCS heat-up. In the proposed EAL CA5.2 for CCNPP and Ginna, the threshold is for an unplanned RCS pressure rise "as a result of a temperature rise." This could imply that an unplanned RCS pressure rise must be validated by determining that RCS temperature is also rising.

Explain how a timely emergency classification could be made if the decision-maker must verify that the unplanned pressure rise is a result of a temperature rise. Alternatively, remove the phrase "as a result of a temperature rise" from the proposed CCNPP and Ginna EAL CA5.2.

RAI-20 (CCNPP)

The CCNPP EAL CS6.2 uses a reactor vessel level monitoring system indication that is relatively close to the threshold value for approximately the top of active fuel. This indication is not typically available while the reactor is being refueled.

Explain why RCS level indication typically available during shutdown conditions is not used for CCNPP EAL CS6.2.

RAI-21 (Ginna)

The Ginna comparison matrix for the proposed EAL CS6 identified the following differences with NEI 99-01 EAL CS1.1 and CS1.2, respectively:

1) EAL 1 not included as per guidance in developer notes since 6" below bottom [inside diameter] of RCS loop is below level indication lowest value.
2) EAL 2 not included as per guidance in developer notes since top of active fuel is below level indication lowest value,.

Similarly, the Ginna comparison matrix for the proposed EAL CG6 indicates that NEI 99-01 EAL CG1.1 cannot be developed because no level indication exists that corresponds to the top of active fuel.

The NEI 99-01 Developer Notes state that if the level can be determined during some shutdown modes or conditions, but not others, then specify the mode-dependent and/or configuration states during which the level indication is applicable. In addition, the guidance states that the level indication is for "approximately the top of active fuel," so it does not have to be exactly the top of active fuel.

a. Identify the RCS level indications that are available that would provide the closest approximately to the top of active fuel. Explain why an indication that is normally available while in shutdown cooling was not used to provide a site-specific RCS level for Ginna EALs CS6 and CG6.

b. During shutdown conditions, licensees typically have level indication available near the bottom inside diameter of the RCS loop. Explain why such level indication was not used for Ginna EAL CS6.

RAI-22 (CCNPP, Ginna, NMP-1, NMP-2)

The proposed CCNPP, Ginna, NMP-1, and NMP-2 EALs HU1.3, HA1.2, and HS1 rely on notification by the "Security Force." The basis for these EALs state, in part: "Timely and accurate communications between Security Shift Supervision and the Control Room is essential for proper classification of a security-related event." In addition, the guidance in NEI 99-01 indicate that the licensee should list the site-specific security shift supervision for these EALs.

Explain how the term "Security Force" is equivalent to "security supervision," as the intent of EALs HU1.3, HA1.2, and HS1 is to ensure an individual specifically trained to identify a hostile action and communicate with the control room is tasked with this responsibility. Alternatively, revise these EALs to include the site-specific security shift supervision.

RAI-23 (CCNPP, Ginna, NMP-1, NMP-2)

For CCNPP, Ginna, NMP-1, and NMP-2, the second criterion of proposed EAL HS2 is met if any of the key safety functions (i.e., reactivity control and core and RCS heat removal) is not reestablished in 15 minutes. The basis discussion for EAL HS2 states, in part:

The time period to establish control of the plant starts when either:

a. Control of the plant is no longer maintained in the Main Control Room

OR

b. The last Operator has left the Main Control Room.

The first condition does not provide a clear indication of when the time period to reestablish control of the key safety functions begins. It is not clear how "control of the plant" relates to control of the key safety functions.

Clarify the start time for determining when control of the key safety functions needs to be reestablished.

RAI-24 (CCNPP, Ginna)

For CCNPP and Ginna, proposed EAL HU3.2 requires an emergency classification for the receipt of a single fire alarm in any vital area listed in Table H2 and the existence of is not verified within 30 minutes of the alarm. The containment building is listed as a vital area in Table H2, and EAL HU2 could result in an event declaration due to the spurious actuation of a single fire alarm.

Explain why, or why not, including the containment building as a vital area in EAL Table H2 for CCNPP and Ginna is appropriate. Provide a revision to EAL HU3.2, as appropriate.

RAI-25 (CCNPP, Ginna, NMP-1, NMP-2)

For CCNPP, Ginna, NMP-1, and NMP-2, the proposed EAL HU4.2.b requiring validation of the seismic event is not consistent with NEI 99-01. For CCNPP, NMP-1, and NMP-2, the proposed EAL criterion HU4.2.b does not include a threshold value stating that the occurrence of a seismic event is confirmed by the Shift Manager, as discussed in the NEI 99-01 Developers Notes.

For CCNPP, Ginna, NMP-1, and NMP-2, the basis discussion for EAL HU4 states, in part:

> Event verification with external sources should not be necessary during or following an [operating basis earthquake]. Earthquakes of this magnitude should be readily felt by on-site personnel and recognized as a seismic event (e.g., typical lateral accelerations are in excess of 0.08g).

This basis appears to be the same as the generic guidance in NEI 99-01, as it includes the same lateral acceleration value. The justification that the earthquake should be readily felt and recognized as a seismic event by onsite personnel needs to consider the site-specific operating basis earthquake.

a. Describe the procedures and/or guidance that are available to control room personnel to support the timely performance of EAL HU4.2.b validation actions.

b. For CCNPP, NMP-1, and NMP-2, provide justification for not including a threshold value in EAL HU4.2.b that the shift manager confirms the seismic event. Alternatively, revise EAL HU4.2.b, consistent with NEI 99-01, to include confirmation by the shift manager as part of the EAL.

c. Explain why the basis discussion includes typical lateral acceleration values used in the generic NEI 99-01 guidance. Confirm that personnel could readily feel and recognize a seismic event consistent with the operating basis earthquake.

RAI-26 (CCNPP, Ginna, NMP-1, NMP-2)

EAL HA5 is for a gaseous release that impedes access to equipment necessary for normal plant operations, cooldown, or shutdown. NEI 99-01 identifies EAL HA5 as applicable in all operating modes. For CCNPP, Ginna, NMP-1, and NMP-2, proposed EAL HA5 lists specific areas and is not applicable in all operating modes. Plant modifications could result in additional areas and/or operating modes that need to be included in EAL HA4.

Describe the administrative controls in place to ensure that future plant changes are considered for potential changes to EAL HA5 for CCNPP, Ginna, NMP-1, and NMP-2.

RAI-27 (CCNPP, Ginna, NMP-1, NMP-2)

On June 29, 2017, the NRC and Exelon had a pre-application meeting to discuss potential changes to the EALs for its facilities (ADAMS Accession No. ML17184A009). Many of the EAL changes proposed by the licensee are discussed in emergency plan frequently asked questions,

which are available on the NRC public Web site.[1] Exelon stated it would supplement its May 31, 2017, application for CCNPP, Ginna, NMP-1, and NMP-2 to include the proposed changes discussed during the meeting.

Provide the proposed EAL changes discussed during the June 29, 2017, public meeting or identify those changes that Exelon will not include as part of this application.

[1] https://www.nrc.gov/about-nrc/emerg-preparedness/faq/faq-contactus.html

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