



Exelon Generation®

Mark D. Flaherty  
Site Vice President

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

410 495 5200 Office  
443-534-5475 Mobile  
www.exeloncorp.com

mark.flaherty@exeloncorp.com

10 CFR 50.46

January 31, 2018

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 Commitment Changes

Reference: 1. Letter from M. D. Flaherty (Exelon) to Document Control Desk (NRC), dated May 2, 2016, Calvert Cliffs GSI-191 Resolution Plan

In Reference 1, Calvert Cliffs Nuclear Power Plant made five commitments on our risk-informed resolution to Generic Safety Issue 191 (GSI-191) and response to Generic Letter 2004-02. Two of these commitments now need to be revised to tie their completion to the approval of our upcoming GSI-191 license amendment request. This reflects that the Nuclear Regulatory Commission approval might involve additional plant changes or insulation remediation to be accomplished.

Attachment (1) shows the commitment change for the two commitments being revised. Attachment (1) also shows the entire revised list of GSI-191 commitments.

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 January 31, 2018.

Respectfully,



Mark D. Flaherty  
Site Vice President

MDF/KLG/bjm

Attachment: (1) List of 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 action committed to in this submittal. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

**Existing Commitments to be Changed**

<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)

**Revised Commitments**

<b>Regulatory Commitment</b>	<b>Completion</b>
Calvert Cliffs will complete any necessary insulation replacements or remediation, or other identified plant changes for Calvert Cliffs Unit 1. This completion date is predicated on the successful completion of our Option 2 approach.	No later than the second refueling outage for Unit 1 following NRC issuance of the Safety Evaluation on the Calvert Cliffs Option 2b GSI-191 license amendment request and acceptance of the Calvert Cliffs Generic Letter 2004-02 final submittal.
Calvert Cliffs will complete any necessary insulation replacements or remediation, or other identified plant changes for Calvert Cliffs Unit 2. This completion date is predicated on the successful completion of our Option 2 approach.	No later than the second refueling outage for Unit 2 following NRC issuance of the Safety Evaluation on the Calvert Cliffs Option 2b GSI-191 license amendment request and acceptance of the Calvert Cliffs Generic Letter 2004-02 final submittal.

**ATTACHMENT (1)**

**LIST OF REGULATORY COMMITMENTS**

**Calvert Cliffs Entire GSI-191 Commitments**

<b>Regulatory Commitment</b>	<b>Completion</b>
Calvert Cliffs will complete any necessary insulation replacements or remediation, or other identified plant changes for Calvert Cliffs Unit 1. This completion date is predicated on the successful completion of our Option 2 approach.	No later than the second refueling outage for Unit 1 following NRC issuance of the Safety Evaluation on the Calvert Cliffs Option 2b GSI-191 license amendment request and acceptance of the Calvert Cliffs Generic Letter 2004-02 final submittal.
Calvert Cliffs will complete any necessary insulation replacements or remediation, or other identified plant changes for Calvert Cliffs Unit 2. This completion date is predicated on the successful completion of our Option 2 approach.	No later than the second refueling outage for Unit 2 following NRC issuance of the Safety Evaluation on the Calvert Cliffs Option 2b GSI-191 license amendment request and acceptance of the Calvert Cliffs Generic Letter 2004-02 final submittal.
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.	No later than three months after NRC issuance of the Safety Evaluation on the South Texas Project Risk-Informed GSI-191 Pilot Project and the Safety Evaluation on WCAP-17788, whichever is later.
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.	No later than three months after NRC issuance of the Safety Evaluation on the South Texas Project Risk-Informed GSI-191 Pilot Project and the Safety Evaluation on WCAP-17788, whichever is later.
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.	No later than three months after NRC issuance of the Safety Evaluation on the South Texas Project Risk-Informed GSI-191 Pilot Project and the Safety Evaluation on WCAP-17788, whichever is later.