

From: [Marshall, Michael](#)
To: ["Villar, Enrique:\(GenCo-Nuc\)"](#)
Subject: FYI: Topics NRC Staff Would Like Exelon to Address at Calvert Cliffs 50.69 LAR Pre-submittal Meeting (L-2018-LRM-0059)
Date: Thursday, September 27, 2018 7:42:00 AM

Hello Rick,

Two of the benefits of pre-submittal meetings are making sure the NRC staff and licensee have a shared understanding of (1) the content needed in a submittal for acceptance and (2) the level of detail needed in a submittal to minimize the need for RAIs. In order for Exelon to gain the maximum benefit from the pre-submittal meeting, the following topics should be addressed in Exelon's presentation to the NRC staff at the October 4th public pre-submittal meeting:

- Describe the integrated, systematic process being used to support the risk-informed categorization and treatment of SSCs.
- Describe whether the case studies in the EPRI report are bounding for Calvert Cliffs.
- Describe how the proposed approach addresses the discussion in Section II.1.2 of the statements-of-consideration for 10 CFR 50.69.
- Identify any differences between the approved Limerick 50.69 LAR and the planned Calvert Cliffs 50.69 LAR.
- Identify which portions of the EPRI report (or information in the EPRI report) will be included in the submittal.
- Identify which portions of the EPRI report that Exelon will be using as the technical justification for the planned amendment.
- Describe whether the alternative approach described in the EPRI report can be considered a bounding approach.
- For the PRAs used in the case studies, state whether the PRAs have been used to support NRC approval of licensing actions comparable to the planned 50.69 LAR.
- For the SPRAs used in the case studies in the EPRI report, describe whether peer-review findings have been appropriately addressed for risk-informed licensing actions and whether SPRA peer-review findings have been closed out using an NRC-approved process.
- Discuss the relevance of the Near Term Task Force 2.1 evaluations in determining the appropriate tier for the proposed alternative approaches considering the differences in scope and purpose.
- Discuss why correlated failures that are evaluated for Tier 2 plants are not considered for Tier 1 plants (i.e., why Tier 2 evaluations are not performed for Tier 1).
- Describe how risk significant SSCs identified by fire PRA will be addressed considering the incorporation of a new approach that relies on fire PRA models to identify SSCs that are important to safety.
- Describe - how Exelon will address the potential hazard changes that may change the current proposed Tier 1 classification in the future and therefore, the categorization approach with respect to seismic risk.

If Exelon plans to use any presentation material during the public meeting, please provide a

copy of the presentation material to me at least two days prior to the meeting.

Best Regards,
Michael L. Marshall, Jr.
Senior Project Manager

Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

301-415-2871