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**To:** [Gropp Jr., Richard W. \(GenCo-Nuc\) \(Richard.Gropp@exeloncorp.com\)](#)  
**Cc:** [James Danna \(James.Danna@nrc.gov\)](#); ["Villar, Enrique \(GenCo-Nuc\)"](#)  
**Subject:** CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2 –REQUEST FOR ADDITIONAL INFORMATION REGARDING RELOCATION OF EMERGENCY OPERATION FACILITY (EPID L-2018-LLA-0241)  
**Date:** Thursday, December 13, 2018 9:22:00 AM

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Hello Richard,

By letter dated August 30, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18242A067), Exelon Generation Company, LLC, submitted to the U.S. Nuclear Regulatory Commission (NRC) a license amendment request (LAR) to relocate and consolidate the Emergency Operations Facility (EOF) and Joint Information Center (JIC) for Calvert Cliffs Nuclear Power Plant (CCNPP) with the existing Exelon Joint EOF and JIC (hereafter referred to as the Coatesville EOF/JIC) located in Coatesville, Pennsylvania. The Coatesville EOF/JIC is currently used as an EOF/JIC facility for Limerick Generating Station -Units 1 and 2 (LGS), Peach Bottom Atomic Power Station - Units 2 and 3 (PBAPS), and Three Mile Island Nuclear Station (TMI). The amendment would increase the number of sites supported by the Coatesville EOF/JIC facility from three to four.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided in the LAR and has determined that additional information is needed to complete its review. Below is the NRC staff's request for additional information. The request for additional information was discussed with you on December 12, 2018, and it was agreed that your response would be provided by January 15, 2019.

## **REQUEST FOR ADDITIONAL INFORMATION**

### **RAI-CC-1**

Section 2.0, "Detailed Description," of Enclosure 1, "Evaluation of Proposed Changes," (Page 2 of 24), states, in part:

The NRC and affected offsite emergency response organizations (e.g., ***Federal***, State, and Local agencies) will be invited to observe and/or participate in this drill.

However, Enclosure 5, "Summary of Commitments," states, in part,

The NRC and affected offsite emergency response organizations (e.g., State and Local agencies) will be invited to observe and/or participate in this drill, as deemed necessary.

Please clarify whether the Federal Emergency Management Agency (FEMA) will be invited to observe interactions with offsite response organizations from the Coatesville EOF/JIC during this drill, or provide basis for not providing FEMA the opportunity to observe drill.

### **RAI-CC-2**

Section 3.1, "Functions," of Enclosure 1 (Page 10 of 24) states, in part:

Nevertheless, the EOF/JIC staff will receive training on the applicable characteristics of CCNPP prior to implementation of the proposed changes to relocate and consolidate the CCNPP EOF/JIC at the existing Coatesville EOF/JIC facility.

However, in a letter date November 20, 2018 (ADAMS Accession No. ML18324A404), Exelon stated, in part:

The Operations Assistant position was added following the relocation of TMI's [Three Mile Island] EOF to Coatesville to provide TMI specific Operations knowledge in support of the existing Corporate based Technical Support Manager and Operations Advisor positions. With TMI permanently shut down and defueled, the spectrum of credible accidents and operational events no longer require the augmented position; therefore, the Operations Assistant position in the EOF can be eliminated without impacting TMI's ability to respond to an event.

Please clarify whether there will be a similar position or equivalent expertise operational in the EOF with CCNPP-specific (pressurized water reactor) operations background that will be familiar with CCNPP Emergency Operating Procedures and plant system, structures and components required to support EOF function, or justify why position/expertise is not required.

**RAI-CC-3**

Section 3.9, "Records Availability and Management," of Enclosure 1 (Page 17 of 24) states, in part:

The Coatesville EOF/JIC has the capability to maintain hard copies of key reference materials for CCNPP, if needed.

However, the under the listing of examples, only station emergency plans and State emergency plans are listed as hard copies. Please explain what criteria would be used to determine if a hard copy of key reference materials for CCNPP would be needed.

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

Plant Licensing Branch I  
Division of Operating Reactor Licensing  
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301-415-2871

Docket No. 50-317 and 50-318