

**From:** [Marshall, Michael](#)  
**To:** [Villar, Enrique:\(GenCo-Nuc\) \(Enrique.Villar@exeloncorp.com\)](#); [Greene, Ken:\(CCNPP\) \(ken.greene@exeloncorp.com\)](#)  
**Subject:** CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2 – REQUEST FOR ADDITIONAL INFORMATION REGARDING EXEMPTION REQUEST FROM 10CFR50.46(A)(1) TO SUPPORT RESOLUTION OF GSI-191 (EPID L-2018-LLE-0013)  
**Date:** Monday, March 11, 2019 7:28:00 AM

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Hello Rick and Ken,

By letter dated August 13, 2018 (Agencywide Document Access Management System (ADAMS) Accession No. ML18226A189) a supplemented by letter dated October 10, 2018 (ADAMS Accession No. ML18283A034), Exelon Generation Company, LLC (Exelon, the licensee) submitted an exemption request for Calvert Cliffs Nuclear Power Plant, Units 1 and 2. The proposed exemption request would allow use of the risk-informed method for assessing the impact of debris on long-term cooling.

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 February 26, 2019, and it was agreed that your response would be provided within 30 days of the date of this email.

The request for additional information question listed below is not a complete listing of the additional information needed to complete the NRC staff's review. Additional RAI questions will be provided by separate emails.

### **REQUEST FOR ADDITIONAL INFORMATION**

Section 51.30(a) of Title 10 of the Code of Federal Regulations requires, in part, that an environmental assessment include a brief discussion of the environmental impacts of the proposed action and alternatives, as appropriate. NRC staff has determined that environmental impacts (e.g., additional worker dose and radiologically contaminated waste) could occur in association with the No Action Alternative, should the subject exemption and license amendment request not be granted.

Section 2.2 of Attachment (2) of Exelon's letter dated August 13, 2018 identifies plant modifications and estimates the total dose to be expended for replacement of insulation under the No Action Alternative. But, no estimate is provided for the amount of fibrous insulation that would be replaced.

In order to support the evaluation of potential waste management impacts, NRC requests that Exelon provide the estimated volume of radiologically-contaminated waste that would be generated from the replacement of the existing insulation on the components discussed in Section 2.2 of Attachment (2).

Best Regards,  
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Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

301-415-2871

Docket No. 50-317 and 50-318