

From: [Marshall, Michael](#)
To: [Mascitelli, Francis J:\(Exelon Nuclear\)](#)
Cc: [Danna, James](#); [Helker, David P:\(Exelon Nuclear\)](#)
Subject: CALVERT CLIFFS 1 AND 2 - LICENSE AMENDMENT REQUEST TO CHANGE SPENT FUEL POOL COOLING DESIGN BASIS (EPID L-2021-LLA-0112)
Date: Monday, August 09, 2021 3:57:00 PM

Hello Frank,

By letter dated June 14, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21165A406), Exelon Generation Company, LLC submitted a license amendment request (LAR) for Calvert Cliffs Nuclear Power Plant, Units 1 and 2 (Calvert Cliffs). The LAR proposes to change the design basis for spent fuel pool cooling. Exelon requested that the U.S. Nuclear Regulatory Commission (NRC) staff complete our review prior to the Calvert Cliffs Spring 2022 refueling outage. By email dated July 19, 2021 (ADAMS Accession No. ML21201A048), the NRC sent Exelon the results of the NRC staff acceptance review that included estimated level of effort and date to complete the review. The purpose of this email is to make you aware of challenges that may adversely affect the level of effort needed to complete the review and the completion date in the July 19, 2021 email.

As you are aware and as discussed during a public meeting on July 13, 2021, the NRC staff identified several issues in the June 14, 2021 LAR. Examples of the issues discussed during the meeting included:

- The description of the proposed changes in Section 2.2 of the LAR included many proposed changes that did not require prior NRC approval. Working with Exelon to identify which changes required NRC prior approval delayed the completion of the acceptance review.
- For the proposed changes that do require prior NRC approval, the LAR did not contain a justification for each of the proposed changes described in the LAR.
- The no significance hazards consideration provided by Exelon in the LAR does not address all aspects of the proposed change described in the LAR.

After this public meeting, Exelon informed the NRC staff that it planned to supplement the LAR to address these shortcomings. As of the date of this email, the NRC has not received the supplement. Despite these issues with the LAR, the NRC staff accepted the LAR for review.

To facilitate the NRC's review of the application, NRC has been conducting a regulatory audit. The audit plan (ADAMS Accession No. ML21200A074) was issued to Exelon on July 20, 2021. During the audit, the NRC staff has identified additional issues and encountered delays in accessing information, such as the following:

- The NRC staff was informed of the draft status of a calculation referenced in the LAR after asking that a copy of calculation be provided to the NRC staff during our regulatory audit. A copy of the final calculation was made available to the NRC staff two weeks into our five-week regulatory audit.

- The NRC staff was informed the revision numbers of two of the calculations referenced in the LAR were incorrect after asking that a copy of calculation be provided to the NRC staff during our regulatory audit. The error in revision number created unwarranted confusion and delay over whether the NRC staff needed to review the copy of the calculations made available to the NRC staff during the regulatory audit.

Because Exelon requested that the review be completed prior to the Calvert Cliffs, Unit 1 2022 refueling outage, and because Exelon submitted the LAR six months prior to its requested completion date, the review schedule does not have any schedule slack to accommodate poor quality (including incomplete) information or delays in information provided by Exelon. Continued quality issues and delays in providing information to the NRC, during the remainder of the review (including, regulatory audit), may adversely affect the resources needed to complete the review and the duration of the review.

If you have any questions, please contact me.

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

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

Docket Numbers: 50-317 and 50-318