



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

November 14, 2022

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2 –
NOTIFICATION OF CONDUCT OF TITLE 10 OF THE CODE OF FEDERAL
REGULATIONS 50.69, "RISK-INFORMED CATEGORIZATION AND
TREATMENT OF STRUCTURES, SYSTEMS, AND COMPONENTS FOR
NUCLEAR POWER REACTORS," INSPECTION

Dear David Rhoades:

The purpose of this letter is to notify you that U.S. Nuclear Regulatory Commission (NRC) staff will conduct a Title 10 of the *Code of Federal Regulations* (10 CFR) 50.69 program inspection at Calvert Cliffs Nuclear Power Plant, Units 1 and 2, in April 2023. The inspection team will be composed of personnel from the Region I Office and led by Manan Patel. The inspection will be conducted in accordance with Inspection Procedure 37060, the NRC's special and infrequently performed inspection procedure. The inspection is being performed because the requirements of 10 CFR 50.69 have been implemented at Calvert Cliffs Nuclear Power Plant, Units 1 and 2, following the issuance of license amendments on February 23, 2020 (ADAMS Accession No. ML19330D909).

The schedule for the inspection is as follows:

- On-Site Inspection: Weeks of April 9, 2023 and April 23, 2023

An initial list of the documents that the team will review during the conduct of the inspection are listed in the enclosure. The team leader will contact you with any additional specific document requests prior to the start of the inspection. Your cooperation and support during this inspection will be appreciated.

If you have questions concerning this inspection, or the inspection team's information request or logistical needs, please contact Manan Patel, Team Leader at (610) 337-5304, or via email at Manan.Patel@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, under Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Glenn T. Dentel, Chief
Engineering Branch 2
Division of Operating Reactor Safety

Docket Nos. 05000317 and 05000318
License Nos. DPR-53 and DPR-69

Enclosure:
10 CFR 50.69 Program Supporting
Documentation

cc: Distribution via LISTSERV®

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DOCUMENT NAME: <https://usnc.sharepoint.com/teams/EngineeringBranch2/Shared Documents/Branch 50.69/Calvert Cliffs 50.69 Inspection/RFI/Calvert Cliffs 2023 50.69 Inspection Info Request Letter final.docx>
 ADAMS ACCESSION NUMBER: ML22314A087

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10 CFR 50.69 Program Supporting Documentation

If you have any questions regarding this information request, please contact Manan Patel, as soon as possible, at (610) 337-5304 or via email at Manan.Patel@nrc.gov. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's Regional office. Paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on *typical documents* that a generic plant might have. As such, this generic document request is not meant to imply that any specific plant is required to have all of the listed documents. It is recognized that some documents listed below may not be available for your plant. In addition, the document titles listed below are based on typical industry document names; your plant specific document titles may vary.

Information Requested by March 17, 2023

1. Licensing bases documents:
 - a. Calvert Cliffs 10 CFR 50.69 License Amendment Request (LAR).
 - b. Responses to Requests for Additional Information regarding the Calvert Cliffs 10 CFR 50.69 LAR.
 - c. U.S. NRC Safety Evaluation Report and approval of 10 CFR 50.69 LAR.
 - d. Updated Final Safety Analysis changes associated with the implementation of 10 CFR 50.69 at Calvert Cliffs.
 - e. NEI 00-04.
 - f. Units 1 and 2 Facility Operating License.
2. Copy (latest revision) of 10 CFR 50.69 program procedures.
3. 10 CFR 50.69 categorization documents (Word portion only) for all systems which have completed system categorization.
4. Probabilistic Risk Assessment (PRA) system notebooks for systems that have completed system categorization.
5. List of structures, systems, and components (SSCs), broken down by system, that have alternate treatment plans that are implemented or planned to be implemented. Only include systems that have been reviewed at Integrated Decision-Making Panel (IDP) meetings to date.
6. List of Risk-Informed Safety Class (RISC)-1, RISC-2, and RISC-3 component failures (issue report designator and title will be acceptable) since implementing the program requirements on associated systems. If applicable, provide any performance indicators utilized to monitor performance of RISC-1, RISC-2, and RISC-3 SSCs consistent with categorization process assumptions and in the PRA model.

7. A list of procedure changes and revisions to licensee administrative procedures that were implemented for alternative treatment of regulatory requirements under 10 CFR 50.69 (example: changes to In-service Testing Program procedures, Maintenance Rule Program procedures, etc.).
8. Meeting Minutes for all IDP meetings to date.
9. List of Corporate and Calvert Cliffs issue reports (designator and title) associated with the implementation of the 10 CFR 50.69 process at Calvert Cliffs. Do not include issue reports only associated with the submittal and approval of the 10 CFR 50.69 license amendment.
10. Audits and self-assessments of the Calvert Cliffs/Corporate 10 CFR 50.69 Program since the issuance of the 10 CFR 50.69 license amendment (July 31, 2018).
11. List of all changes or upgrades made to the PRA model of record utilized for 10 CFR 50.69 Program since the issuance of the 10 CFR 50.69 license amendment on July 31, 2018.
12. Applicable credentials of IDP members.
13. Provide program requirements that implement the requirement for feedback and process adjustments per 10 CFR 50.69(e). Provide a summary of updates, if applicable, to the categorization or treatment processes as a result of changes to the plant, operational practices, operating experience, or as a result of the performance issues of RISC-1, 2, or 3 SSCs.
14. Licensee event reports associated with any reportable events per 10 CFR 50.69 (g) since implementation of the program at Calvert Cliffs.
15. Appendix C, "Additional Conditions," to the license amendment required Constellation to complete the implementation items listed in Attachment 2 of Constellation letter to the NRC dated April 23, 2018, prior to implementation of 10 CFR 50.69. For each of the items in Attachment 2 please provide:
 - a. A summary of the change and how the change was implemented.
 - b. The completion date of the change.
 - c. If applicable, provide the results of any specified follow-up action (e.g., conduct a focused-scope peer review of the pre-initiator analysis, and resolve any resulting findings and observations).
16. PRA model information (e.g., Excel spreadsheet) providing a listing of all basic events with all available importance measures (e.g., Birnbaum, F-V, RAW and RRW) and an associated list of the top 500 CDF cutsets. Please provide top 100 LERF cutsets as well. This information shall be taken from the PRA model of record used in the 10 CFR 50.69 categorization process.
17. System drawings identifying the RISC category of passive system components for systems that have completed the categorization process.

18. If a seismic PRA was not used for passive risk categorization, please provide the Safe Shutdown Equipment List (used for Seismic Margins Analysis).

19. The plant's Individual Plant Examination of External Events.