



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 25, 2012

Mr. George H. Gellrich, Vice President
Calvert Cliffs Nuclear Power Plant, LLC
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: EXEMPTION FROM 10 CFR
PART 26, FITNESS FOR DUTY PROGRAMS - CALVERT CLIFFS NUCLEAR
POWER PLANT, UNIT NOS. 1 AND 2 (TAC NOS. ME6738 AND ME6739)

Dear Mr. Gellrich:

By letter dated July 21, 2011, Calvert Cliffs Nuclear Power Plant, LLC requested an exemption from certain requirements of Title 10 of the *Code of Federal Regulations* Part 26, "Fitness for Duty Programs," at Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2. The exemption would involve work hour controls during declarations of severe weather conditions involving tropical storm or hurricane-force winds or severe winter precipitation.

The Nuclear Regulatory Commission staff has concluded that additional information will be required in order to continue its review. As discussed with your staff, we understand that you intend to respond to the enclosed request for additional information within 60 days of the date of this letter. We also understand that this date may require adjustment due to the spring 2012 refueling outage at Unit No. 1.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Douglas V. Pickett".

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosure:
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

PROPOSED EXEMPTION FROM THE REQUIREMENTS OF 10 CFR 26.205(c) AND (d)

DOCKET NOS. 50-317 AND 50-318

By letter dated July 21, 2011, Constellation Energy, the licensee for Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, (Calvert Cliffs) requested an exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue. Specifically, the letter requested an exemption from the requirements of 10 CFR 26.205 (c) and (d) for meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane-force winds or severe winter precipitation.

The purpose of the request is to allow Calvert Cliffs to ensure that the plant reaches and maintains a safe and secure status during severe wind conditions as adherence to all work hour control requirements could impede the ability to respond to a plant emergency. The sequestering of plant personnel may be necessary at times during declarations of severe weather.

The NRC staff performed a preliminary review of the exemption request and determined the licensee's response to the following request for additional information (RAI) is needed for the NRC staff to complete its review in a timely manner.

- Lessons learned from NUREG-1474 include that as much as possible, site preparation for a hurricane should occur prior to the need to sequester individuals. What is the time period that is allocated for personnel to prepare the site for a storm, prior to the arrival of hurricane force winds on-site? Please be as precise as possible with respect to the number of days or hours prior to the arrival of severe winds.
- The exemption request discusses entry conditions that would be used prior to entering the Emergency Response Plan. Per the Emergency Response Plan, an unusual event is declared when sustained wind speed is greater than 75 mph. No specific weather related criteria are included in the exemption request. What are the technical considerations that the General Supervisor for Online Scheduling or the Operations Shift Manager will use to determine entry into this exemption?
- Many factors contribute to fatigue; one of these factors is inconsistent start times. In order to manage fatigue during sequestration, will shift start times be pre-planned and consistent? Please explain the rationale for organizing current shift start times during sequestration.

Enclosure

- The exemption request discusses a need to sequester individuals onsite to perform preparation, response and recovery actions associated with a severe weather event. Please provide specific procedural references that control the sequestering of individuals onsite during a severe weather event, or describe how the need to sequester individuals will be incorporated into current procedures.
- The NRC staff is not only concerned with fatigue management prior to and during the requested exemption, staff is equally concerned with site individuals' fatigue when returning to work hour controls such that the resumption of work hour controls is prudently implemented and individuals are not fatigued on the first day on work hour controls. Please indicate what general criteria that plant management will consider when making the determination to resume work hour controls.
- In the cover letter dated July 21, 2011, Calvert Cliffs indicated that the exemption request included declarations of severe weather conditions involving severe winter precipitation. However, the attachment to the cover letter did not include specific information regarding severe winter precipitation. Please provide sufficient supporting material for severe winter precipitation or clarify that the cover letter was in error.

January 25, 2012

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Sincerely,
/RA/

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

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