750 East Pratt Street, Suite 1600 Baltimore, Maryland 21202



10 CFR 50.4

February 21, 2012

UN#12-017

ATTN: Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016 Calvert Cliffs Nuclear Power Plant, Unit 3, Updated RAI Closure Plan

- References: 1) UniStar Nuclear Energy Letter UN#11-290, from Greg Gibson to Document Control Desk, U.S. NRC, Updated RAI Closure Plan, dated November 30, 2011
 - 2) UniStar Nuclear Energy Letter UN#12-016, from Mark Finley to Document Control Desk, U.S. NRC, UHS RAI Plan, dated February 10, 2012
 - 3) Surinder Arora (NRC) to Paul Infanger (UniStar Nuclear Energy), "FINAL RAI No. 316 SEB2 5988" email dated August 17, 2011

On November 30, 2011, UniStar Nuclear Energy (UNE) submitted an Updated RAI Closure Plan for the Phase 2 and Phase 4 review of the Calvert Cliffs Nuclear Power Plant Unit 3 (CC3) Combined License Application (COLA) (Reference 1). This letter provided the UNE response schedule for all outstanding RAI questions.

In Reference 1, UNE also presented a revised strategy for addressing the outstanding RAIs relating to seismic analyses. The proposed strategy would encompass existing RAIs, address the regional Mineral Virginia earthquake impact and also incorporate the revised EPRI/NRC/DOE Central and Eastern United States (CEUS) Seismic Source Model. The RAI response schedule, included as the Enclosure to Reference 1, assumed that the final version of the joint EPRI/NRC/DOE CEUS document would be issued in mid-January 2012. Ultimately, the EPRI/NRC/DOE CEUS document was not issued until February 1, 2012 and the associated database will not be publicly available until late April 2012. Although the delay in issuance of the EPRI/NRC/DOE CEUS document was relatively short, the availability of certain key subcontractors was affected. In addition, work was re-sequenced to place high priority on

UN#12-017 Page 2

responding to FSAR Chapter 2.5 RAIs. The impact of these delays is factored into an updated RAI response schedule (attached).

In addition, UNE has received multiple sets of RAIs relating to the Ultimate Heat Sink (UHS) system. A schedule for the UHS RAI responses was provided in Reference 2. These RAI response dates have been consolidated into the updated RAI Closure Plan provided as the attachment to this letter for completeness.

Revised Closure Plan

Enclosed Table 1 presents UNE's Revised Closure Plan for the open Phase 2 and Phase 4 RAI Civil/Structural/Seismic issues associated with FSAR Chapters 2 and 3 (i.e., FSAR Chapters 2.4, 2.5, 3.7, and 3.8).

Table 2 provides response dates for the remaining non-civil Calvert Cliffs Unit 3 open RAI questions.

Summary

Tables 1 and 2 supersede the previously submitted RAI response schedule dates, and should be utilized by the NRC for schedule and resource planning purposes.

UNE believes that it is critical to proactively address the Fukushima lessons learned regarding the seismic design basis and the CEUS Seismic Source Model. We look forward to having frequent dialogue and interactions with NRC as we progress through closure of these RAIs and our updates/closure of FSAR Chapters 2.4, 2.5, 3.7, and 3.8. UNE continues to have a focus on completing Phase 2 for Chapters 2, 3, 9 and 13 in 2012.

UNE respectfully requests NRC review and acceptance of this Revised RAI Closure Plan based upon our expectation that the seismic reconciliation analyses will confirm that the generic design remains robust and will meet regulatory requirements. As previously discussed, UNE requests that the NRC permit any FSAR Section 3.7 and 3.8 RAI questions with responses scheduled for submittal in 2013 be classified as SER Open Items, to be closed in Phase 4 at the time of final SER preparation. UniStar understands the risk we are assuming as the applicant, for moving closure of some of these RAIs until Phase 4.

UniStar is working in coordination with AREVA and PPL to finalize the plan for addressing the remaining Fukushima lessons-learned for the U.S. EPR design. Together with AREVA and PPL, the proposed plan for Fukushima-related activities will be discussed at the February 28, 2012, U.S. EPR Design-Centered Working Group meeting with the NRC staff.

The schedules in Tables 1 and 2 were prepared using information available as of the date of this letter. It should be noted that the attached schedule assumes timely resolution of the NRC staff concerns with the SASSI subtraction method (RAI 316, Reference 3).

This letter does not contain any proprietary or sensitive information. If there are any questions regarding this transmittal, please contact me at (410) 369-1907, or Mr. Wayne A. Massie at (410) 369-1910.

UN#12-017 Page 3

I declare under penalty of perjury that the foregoing is true and correct.

éb/ruary 21, 2012 Executed of Mark T. Fin**l**ev

Attachments: Table 1 - Civil/Structural/Seismic RAI Response Schedule Table 2 - Remaining Calvert Cliffs 3 RAI Response Schedule

 cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch John Segala, Chief, U.S. EPR Projects Branch Laura Quinn-Willingham, NRC Environmental Project Manager, U.S. EPR COL Application Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application Patricia Holahan, Acting Deputy Regional Administrator, NRC Region II Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2 David Lew, Deputy Regional Administrator, NRC Region I Darrell Gardner, AREVA NP Manager, New Plants Regulatory Affairs Rocco Sgarro, Director, PPL Nuclear Development, Regulatory Affairs UN#12-017

Enclosure

 Table 1 - Civil/Structural/Seismic RAI Response Schedule

 Table 2 - Remaining Calvert Cliffs Unit 3 RAI Response Schedule

Calvert Cliffs Nuclear Power Plant, Unit 3

Activity	RAI Number	Question	UNE Response Date to NRC
Probable Maximum Surge and Seiche Flooding	327	2.04.05-8	02/28/2012
EPGB Settlement - FSAR Input	308	3.08.05-9 (1 of 2)	04/20/2012
Seismic Analysis Cat II SSE	253	3.07.02-45	04/27/2012
Other Category I Structures	333	3.08.04-31	5/11/2012
Other Category I Structures	333	3.08.04-29 3.08.04-32	06/22/2012
Flooding Protection Requirements (schedule letter)	328	2.04.10-1	06/22/2012
Vibratory Ground Motion (GMRS)	284	2.05.02-22	08/31/2012
Vibratory Ground Motion (GMRS)	322	2.05.02-23	08/31/2012
Other Category I Structures	333	3.08.04-30	08/31/2012
Seismic Analysis (CBIS)	253	3.07.02-46	01/23/2013
Seismic Analysis (CBIS)	304	3.07.02-56	01/23/2013
CBIS Seismic & Stability	315	3.07.02-64 (1 of 3)	02/6/2013
Seismic Design Parameters (CBIS)	314	3.07.01-17 (bullet 1)	02/6/2013
ESWB Settlement - FSAR Input	308	3.08.05-9 (2 of 2)	02/26/2013
Seismic Design - Sliding	301	3.08.04-21	04/12/2013
NI, NAB, AB, EWSB and EPGB site-specific seismic analysis	314	3.07.01-16	06/5/2013
TB/SB/AB Stability	315	3.07.02-63	06/5/2013
Nuclear Island (NI) Stability	315	3.07.02-64 (2 of 3)	06/05/2013
EPGB, ESWB and NAB Stability and Interaction	315	3.07.02-62 3.07.02-64 (3 of 3)	07/10/2013
		3.07.02-65	
		3.07.02-66	

Activity	RAI Number	Question	UNE Response Date to NRC
Physical Security	338	13.06.01-23	3/09/2012
(schedule letter)		13.06.01-24	
Large Area Fires	335	19.03-1 through	3/15/2012
(schedule letter)		19.03-46	
Physical Security ITAAC	317	14.03.12-8	3/30/2012
Information Systems Important to Safety	325	7.05-2	4/15/2012
Structural ITAAC	334	14.03.02-19	4/20/2012
Ultimate Heat Sink	287	9.02.05-19	5/21/2012
UHS Tower Interference	331	9.02.05-21	5/21/2012
Information Systems Important to Safety	325	7.05-1	6/22/2012
UHS Makeup Traveling Screens	330	9.02.05-20	6/22/2012
UHS Makeup Layup	332	9.02.05-22	6/22/2012
UHS (Makeup TS, I&C,	336	9.02.05-23	6/22/2012
Seismic)		9.02.05-24	
		9.02.05-25	
	<u> </u>	9.02.05-27	
Initial Plant Test Program - UHS Makeup	337	14.02-58	6/22/2012
Part 30, 40 and 70 Licenses	329	1-14	7/20/2012
Fire Protection Drawings 9B	177	9.05.01-14	11/30/2012