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10 CFR 50.90

August 27, 2018

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

> Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Renewed Facility Operating License Nos. DPR-53 and DPR-69 <u>NRC Docket Nos. 50-317 and 50-318</u>

Subject: Supplement to Response to Request for Additional Information License Amendment Request to Revise Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b."

Reference: Letter from James Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, Response to Request for Additional Information, License Amendment Request to Revise Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b," dated January 11, 2018 (ADAMS Accession No. ML18011A665).

By letter dated January 11, 2018 (Reference), Exelon provided a response to a request for additional information (RAI) concerning the subject amendment request. As part of the response to the RAI, several affected Technical Specifications (TS) were deleted from the amendment request. As a result, Exelon provided a complete set of revised TS markups in the RAI response which superseded the set of TS markups previously provided by Exelon.

Subsequently, it was identified that a TS markup (TS Page 3.6.3-4) had inadvertently been omitted from the response to the RAI. Therefore, Exelon is now providing the TS markup in Attachment 1 to this letter. With the inclusion of this TS markup with the TS markups provided in the RAI response, the TS markups for the subject amendment request are now complete.

Exelon has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of the Reference 1 letter. Exelon has concluded that the information provided in this letter does not affect the bases for concluding that the proposed license

Supplement to Response to Request for Additional Information License Amendment Request Adopt Risk Informed Completion Times TSTF-505 Docket Nos. 50-317 and 50-318 August 27, 2018 Page 2

amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, Exelon has concluded that the information in this letter does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments in this letter.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the State of Maryland of this supplement by transmitting a copy of this letter and its attachment to the designated State Official.

If you have any questions or require additional information, please contact Glenn Stewart at 610-765-5529.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 27th day of August 2018.

Respectfully,

Q. J. Welker

David P. Helker Manager - Licensing and Regulatory Affairs Exelon Generation Company, LLC

Attachments:

- 1. Proposed Technical Specifications Changes TS Page 3.6.3-4 Markup
- cc: USNRC Region I, Regional Administrator USNRC Project Manager, CCNPP USNRC Senior Resident Inspector, CCNPP D. A. Tancabel, State of Maryland

## **ATTACHMENT 2**

## License Amendment Request Supplement

## Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Docket Nos. 50-317 and 50-318

Supplement to Response to Request for Additional Information Revise Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b."

Proposed Technical Specification Changes - TS Page 3.6.3-4 Markup

ACTIONS	(	cont	ti	nu	ied	)
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	CONDITION	REQUIRED ACTION		COMPLETION TIME	
С.	Only applicable to penetration flow paths with one or more containment isolation valves and a closed system.	C.1	Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	72 hours OR In accordance with the Risk Informed Completion Time Program	
	One or more penetration flow paths with one or more containment isolation valves inoperable.	AND C.2	Isolation devices in high radiation areas may be verified by use of administrative means.		
			Verify the affected penetration flow path is isolated.	Once per 31 days following isolation	
D.	Required Action and associated Completion Time not met.	D.1 <u>AND</u>	Be in MODE 3.	6 hours	
T		D.2	Be in MODE 5.	36 hours	

CALVERT CLIFFS - UNIT 1 CALVERT CLIFFS - UNIT 2 Amendment No. 227 Amendment No. 201