



October 27, 2012
LIC-12-0154

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

- References:
1. Docket No. 50-285
 2. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012 (ML12056A045) (NRC-12-0020)
 3. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012 (ML12229A174)
 4. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012 (ML12061A023)
 5. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012 (ML12242A378)

Subject: OPPD Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an Order (Reference 2) to the Omaha Public Power District (OPPD). Reference 2 was immediately effective and directs OPPD to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 2.

Reference 2 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 3) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 2 within 60 days following issuance of Reference 3. This report confirms OPPD has received Reference 3 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 2.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 3, as described in an NEI letter to the NRC (Reference 4).
- A site-specific evaluation establishes the coping capabilities as defined in NEI 12-06 (Reference 5).
- Resources identified and project plans initiated, including development of milestones, to assure compliance with Reference 2.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.
- Identify modifications to meet NEI 12-06 (Reference 5).
- Develop conceptual designs for plant modifications.
- Identify strategy guidance development.
- Develop action plans for long-term storage that meet NEI 12-06 (Reference 5).

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the Order will be completed for Fort Calhoun Station prior to startup from Refueling Outage (28) currently scheduled to begin in the fall of 2015.

If you should you have questions, please contact Mr. Bill Hansher at (402) 533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 27, 2012.

Sincerely,



Louis P. Cortopassi
Site Vice President and CNO

LPC/JKG/mle

c: E. J. Leeds, Director of Office of Nuclear Reactor Regulation
E. E. Collins, Jr., NRC Regional Administrator, Region IV
L. E. Wilkins, NRC Project Manager
J. C. Kirkland, NRC Senior Resident Inspector