



444 South 16th Street Mall
Omaha, NE 68102-2247

LIC-13-0019
February 28, 2013

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

- References:
1. Docket No. 50-285
 2. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ML12054A736) (NRC-12-0020)
 3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012 (ML12242A378)
 4. 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)
 5. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "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)," dated October 27, 2012 (LIC-12-0154)

SUBJECT: Omaha Public Power District's Overall Integrated Plan 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) issued an Order (Reference 2) to all power reactor licensees and holders of construction permits in active or deferred status. The Order was immediately effective and requires the Omaha Public Power District (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 (BDBEE). Specific requirements are outlined in Attachment 2 of Reference 2.

This letter provides the enclosed OPPD Overall Integrated Plan pursuant to Section IV, Condition C.1, of Reference 2. The Nuclear Energy Institute (NEI) has provided guidance (Reference 3) to the industry for compliance with the Order. The NEI guidance was endorsed by the NRC (with exceptions and clarifications) in the Interim Staff Guidance (ISG) (Reference 4), which describes methods acceptable to the NRC for complying with the Order.

This letter confirms OPPD has received Reference 4 and has an Overall Integrated Plan developed in accordance with the guidance for defining and deploying strategies that will enhance the ability to cope with conditions resulting from BDBEEs. Reference 5 provided OPPD's initial status report regarding mitigation strategies, as required by Reference 2.

AISI
NRC

The enclosed Overall Integrated Plan for mitigation strategies is based on conceptual design information. Final design details and associated procedure guidance, as well as any revisions to the information contained in the enclosure, will be provided in the 6-month Integrated Plan updates required by Reference 2.

Table 1 provides the list of open items associated with the FCS FLEX integrated plan. The following open items are defined as items which must be completed before a FLEX mitigation strategy can be established or confirmed. Table 1 identifies the FLEX integrated plan section, sub-section, and associated open items.

No.	FLEX Integrated Plan Section	FLEX Integrated Plan Sub-Section	Open Item
1	General Integrated Plan Elements	Key Site Assumptions to Implement NEI 12-06 Strategies	Communicate exceptions related to Site Security Plan or Other License requirements
2	General Integrated Plan Elements	Provide a Sequence of Events and Identify Any Time Constraint Required for Success Including the Technical Basis for the Time Constraint	Complete Control Room Heatup Calculation
3	General Integrated Plan Elements	Provide a Sequence of Events and Identify Any Time Constraint Required for Success Including the Technical Basis for the Time Constraint	Complete Reactor Coolant System (RCS) Makeup Evaluation with RCP CBO Modification
4	General Integrated Plan Elements	Identify How Strategies Will Be Deployed in All Modes	Develop Playbook
5	Maintain Core Cooling & Heat Removal	Provide a Brief Description of Procedures/Strategies/ Guidelines	Complete Water Chemistry Impact Analysis and review impact on the strategies
6	Maintain RCS Inventory Control	General Description	Complete Core Uncovery Time Evaluation with RCP CBO Isolation. (This is subtask of open item #3.)
7	Maintain Spent Fuel (SFP) Cooling	General Description	Evaluate Auxiliary Building Ventilation Requirements with SFP Evaporation
8	Safety Functions Support	General Description	Evaluate Environmental Conditions after ELAP in critical FLEX deployment areas

There are no regulatory commitments contained in this submittal.

If you should have any questions regarding this submittal, please contact Mr. Bill R. Hansher at (402) 533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 28, 2013.



Louis P. Cortopassi
Site Vice President and CNO

Enclosure: Fort Calhoun Station EA-12-049 (FLEX) Overall Integrated Plan

c: E. E. Collins, Jr., NRC Regional Administrator, Region IV
L. E. Wilkins, NRC Project Manager
J. M. Sebrosky, NRC Project Manager
J. C. Kirkland, NRC Senior Resident Inspector