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Omaha, NE 68102-2247

LIC-13-0123  
August 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. 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) 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012 (ML12242A378)
  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 17, 2012 (ML12305A226) (LIC-12-0154)
  6. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "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)," dated February 28, 2013 (ML13064A298) (LIC-13-0019)

**SUBJECT: Omaha Public Power District's First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

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 (Reference 2) was effective immediately 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 described in Attachment 2 of the Order (Reference 2).

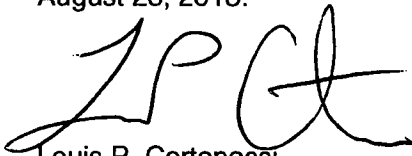
Reference 2 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 3) and an overall integrated plan pursuant to Section IV, Condition C. Reference 3 endorses industry guidance document NEI 12-06, Revision 0 (Reference 4) with clarifications and exceptions identified in Reference 3. Reference 5 provided the OPPD initial status report regarding mitigation strategies. Reference 6 provided the Fort Calhoun Station overall integrated plan.

Reference 2 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 4 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 2, that delineates progress made in implementing the requirements of Reference 2. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

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 August 28, 2013.



Louis P. Cortopassi  
Site Vice President and CNO

LPC/GEG/mle

Enclosure: First Six-Month Status Report for the Implementation of Order EA-12-049

- c: E. J. Leeds, Director, Office of Nuclear Reactor Regulation
- S. A. Reynolds, Acting NRC Regional Administrator, Region IV
- J. M. Sebrosky, NRC Senior Project Manager
- L. E. Wilkins, NRC Project Manager
- J. C. Kirkland, NRC Senior Resident Inspector

## Fort Calhoun Station, Unit No. 1

### First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

#### 1 Introduction

The Omaha Public Power District (OPPD) developed an overall integrated plan (Reference 1), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the overall integrated plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

#### 2 Milestone Accomplishments

None.

#### 3 Milestone Schedule Status

Attachment 1 contains an update to the Milestone Schedule (Reference 1, Enclosure, Attachment 2) provided with the overall integrated plan. The status of each milestone is shown, as are revised completion dates. The dates are planning dates subject to change as design and implementation details are developed.

Attachment 1 is formatted to align with the table provided in the Nuclear Energy Institute's (NEI) Six-Month Status Report Template and supersedes the Milestone Schedule provided by Reference 1. Due to delays in the restart of Fort Calhoun Station, the planned refueling outage dates have changed from the fall of 2014 and spring of 2016 to the spring of 2015 and the fall of 2016, which has resulted in changes to some of the milestone dates provided in the overall integrated plan (Reference 1). The revised milestone target completion dates do not impact the implementation date of the Order.

#### 4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Fort Calhoun Station overall integrated plan (Reference 1). However, one correction is being provided.

The *Essential Instrumentation Equipment and Indicator Locations* Table (Reference 1, Enclosure, Appendix B, Page B-20), inadvertently lists auxiliary feedwater (AFW) Flow A and B (FT-1109 and 1110) as essential instrumentation. While these instruments are desirable for assessing the reactor coolant system (RCS) heat removal function, they are not essential and are not listed in Table 1 of the overall integrated plan (Reference 1, Enclosure, Page 15 of 47). Therefore, FT-1109 and FT-1110 have been deleted from the *Essential Instrumentation Equipment and Indicator Locations* Table. Attachment 2 provides a page superseding Reference 1, Enclosure, Appendix B, Page B-20 with a revision bar in the right margin denoting the location of the revision.

OPPD has developed an interim strategy to address a flood up to 21 feet above Design Basis (i.e., elevation 1035' mean sea level). This strategy is similar to that described in Reference 1, Enclosure, Appendix B, Action 24, but involves a slightly different portable equipment

configuration to accommodate issues not yet addressed by FLEX modifications. Depending on the outcome of the Near Term Task Force Recommendation 2.1 flood re-analysis and detailed design work on FLEX modifications, some or all of the interim equipment and strategies may be incorporated into the Overall FLEX Integrated Plan. OPPD will provide the status of integrating the interim flood strategy into the overall integrated plan in a future six-month update.

**5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

OPPD expects to comply with the Order's implementation date and no relief/relaxation is required at this time.

**6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

The following tables provide a summary of the open items documented in the overall integrated plan (Reference 1) or the Draft Safety Evaluation (SE) and the status of each item.

| <b>Overall Integrated Plan Open Item</b>   | <b>Status</b> |
|--|---------------|
| 1. Communicate exceptions related to Site Security Plan or Other License requirements  | Not Started   |
| 2. Complete Control Room Heatup Calculation  | Started       |
| 3. Complete Reactor Coolant System (RCS) Makeup Evaluation with Reactor Coolant Pump (RCP) Controlled Bleed-off (CBO) Modification | Not Started   |
| 4. Develop Playbook  | Started       |
| 5. Complete Water Chemistry Impact Analysis and review impact on the strategies  | Complete      |
| 6. Complete Core Uncovery Time Evaluation with RCP CBO Isolation. (This is subtask of open item #3.)                               | Not Started   |
| 7. Evaluate Auxiliary Building Ventilation Requirements with Spent Fuel Pool (SFP) Evaporation                                     | Not Started   |
| 8. Evaluate Environmental Conditions after Extended Loss of AC Power (ELAP) in critical FLEX deployment areas                      | Not Started   |

| <b>Draft Safety Evaluation Open Item</b>    | <b>Status</b> |
|---|---------------|
| Draft SE Not Received as of August 28, 2013 | N/A           |
|   |               |
|   |               |

**7 Potential Draft Safety Evaluation Impacts**

There are no potential impacts to the Draft Safety Evaluation identified at this time.

## **8 References**

The following references support the updates to the overall integrated plan described in this enclosure.

1. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "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)," dated February 28, 2013 (ML13064A298), (LIC-13-0019)
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. (ML12054A736), (NRC-12-0020)

Attachments: 1. FLEX Overall Integrated Implementation Plan Milestone Schedule, Revision 1  
2. LIC-13-0019, Enclosure, Appendix B, Replacement Page B-20

**Fort Calhoun Station EA-12-049 (FLEX) Overall Integrated Implementation Plan**

**Milestone Schedule  
 Revision 1**

The following milestone schedule is provided. The dates are planning dates subject to change as design and implementation details are developed. Any changes to the following target dates will be reflected in subsequent 6-month status reports.

| <b>Milestone</b>                                 | <b>Target Completion Date</b> | <b>Activity Status</b>   | <b>Revised Target Completion Date</b> |
|--|-------------------------------|--------------------------|---------------------------------------|
| Submit 60-Day Status Report                      | Oct. 2012                     | Complete                 |                                       |
| Submit Overall Integrated Plan                   | Feb. 2013                     | Complete                 |                                       |
| <b>Submit 6-Month Updates:</b>                   |                               |                          |                                       |
| Update 1   | Aug. 2013                     | Complete                 |                                       |
| Update 2   | Feb. 2014                     | Not Started              |                                       |
| Update 3   | Aug. 2014                     | Not Started              |                                       |
| Update 4   | Feb. 2015                     | Not Started              |                                       |
| Update 5   | Aug. 2015                     | Not Started              |                                       |
| Update 6   | Feb. 2016                     | Not Started              |                                       |
| Update 7   | Aug. 2016                     | Not Started              |                                       |
| FLEX Strategy Evaluation                         | Mar. 2013                     | Started                  |                                       |
| Walk-throughs or Demonstrations                  | Sep. 2016                     | Not Started              | Nov. 2016                             |
| Perform Staffing Analysis                        | Sep. 2015                     | Not Started              |                                       |
| <b>Modifications:</b>                            |                               |                          |                                       |
| Modifications Evaluation                         | Mar. 2013                     | Started                  | Dec. 2013                             |
| Design Engineering                               | May 2015                      | Not Started              | Aug. 2015                             |
| Implementation Outage                            | Apr. 2016                     | Not Started              | Oct. 2016                             |
| <b>Storage:</b>                                  |                               |                          |                                       |
| Storage Design Engineering                       | Jul. 2014                     | Not Started              |                                       |
| Storage Implementation                           | Apr. 2016                     | Not Started              |                                       |
| <b>FLEX Equipment:</b>                           |                               |                          |                                       |
| Procure On-Site Equipment                        | Aug. 2014                     | Started                  |                                       |
| Develop Strategies with RRC                      | Nov. 2013                     | Started                  | Mar. 2015                             |
| Install Off-Site Delivery Station (if Necessary) | Not planned at this time      | Not planned at this time |                                       |
| <b>Procedures:</b>                               |                               |                          |                                       |
| PWROG issues NSSS-specific guidelines            | Dec. 2013                     | Started                  |                                       |
| Create Site-Specific FSGs                        | May 2014                      | Not Started              | May 2015                              |
| Create Maintenance Procedures                    | Jun. 2014                     | Not Started              | Feb. 2015                             |
| <b>Training:</b>                                 |                               |                          |                                       |
| Develop Training Plan                            | Nov. 2014                     | Not Started              |                                       |
| Training Complete                                | Jun. 2015                     | Not Started              | Sep. 2016                             |
| Full Site FLEX Implementation                    | Apr. 2016                     | Started                  | Oct. 2016                             |
| Submit Completion Report                         | Dec. 2016                     | Not Started              |                                       |

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Enclosure, Attachment 2  
Page 1

**LIC-13-0019, Enclosure, Appendix B**  
**Replacement Page B-20**

**Essential Instrumentation Equipment and Indicator Locations**

| <b>Instrument Variable and Train</b> | <b>Equipment Tag</b>                      | <b>Indicator</b>   | <b>Indicator Location</b>                |
|--------------------------------------|---|--|--|
| EFWST Level FW-19 B                  | Locally,<br>OR LT-1188<br>(not essential) | Locally, OR<br>LIA-1188 or<br>LI-1188<br>(not essential) | Locally, OR<br>AI-66B<br>(not essential) |
| Wide Range Pressurizer Pressure<br>A | PT-115                                    | PI-115A-2  | AI-179                                   |
| Wide Range Pressurizer Pressure<br>B | PT-105                                    | UR-105/123   | AI-31E                                   |

NOTE: Instrumentation for Spent Fuel Pool Level monitoring would be inoperable during an SBO event. The Spent Fuel Pool Level instrumentation requires modification to meet the requirements of NRC Order EA 12-051 [Ref. 2]. This modification is being carried out under the response to NRC Order EA 12-051.

Staging Location for the 10 kW FDG: The potential location(s) for the staging area for the 10 kW FDG are marked on the plan drawing for Elevation 1007'-0", as shown below:

Figure 12-1: Potential Staging Location(s) for the 10kW FDG

**[[ Withheld Under 10 CFR 2.390 ]]**