



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BLVD  
ARLINGTON, TEXAS 76011-4511

December 17, 2013

EA-13-243

Mr. Lou Cortopassi, Vice President  
and Chief Nuclear Officer  
Omaha Public Power District  
Fort Calhoun Station FC-2-4  
P.O. Box 550  
Fort Calhoun, NE 68023-0550

**SUBJECT: CONFIRMATORY ACTION LETTER – FORT CALHOUN STATION**

Dear Mr. Cortopassi:

This letter confirms the commitments in the December 2, 2013, Omaha Public Power District (OPPD), "Integrated Report to Support Restart of Fort Calhoun Station and Post-Restart Commitments for Sustained Improvement." In the report, OPPD committed to take actions following restart of the Fort Calhoun Station to ensure the improvements realized during the extended outage remain in place and performance continues to improve at the facility.

The NRC recognizes that OPPD conducted a comprehensive review at Fort Calhoun Station to identify the causes of performance deficiencies, identify and fully understand the extent of the conditions associated with these performance deficiencies, and implement appropriate corrective actions. In addition, following the Missouri River Flood of 2011, OPPD conducted extensive reviews of plant systems, structures, and components to assess the impact of flooding and implement those actions required to ensure a safe plant restart.

This Confirmatory Action Letter (CAL) will remain in effect until the NRC has verified that OPPD effectively implements the following commitments:

1. OPPD commits to implement those actions detailed in the December 2, 2013, letter titled, "Integrated Report to Support Restart of Fort Calhoun Station and Post-Restart Commitments for Sustained Improvement," associated with the following areas:
  - Organizational Effectiveness, Safety Culture, and Safety Conscious Work Environment
  - Problem Identification and Resolution
  - Performance Improvement and Learning Programs
  - Design and Licensing Basis Control and Use
  - Site Operational Focus
  - Procedures

- Equipment Performance
  - Programs
  - Nuclear Oversight
  - Transition to the Exelon Nuclear Management Model and Integration into the Exelon Nuclear Fleet
2. OPPD commits to complete the following actions detailed in the Flooding Recovery Action Plan: 1.2.3.21, 1.2.3.82, and 4.4.3.1 through 4.4.3.3. These actions entail:
- Item 1.2.3.21 - Inspect tank and equipment on demineralized water tank for damage
  - Item 1.2.3.82 – Perform independent spent fuel storage installation route load test
  - Item 4.4.3.1 - Gather flood response lessons learned through condition report reviews to determine if procedure or strategy changes should be implemented
  - Item 4.4.3.2 - Review flood design basis and determine if the 2011 flood event provides additional information that should drive design basis changes
  - Item 4.4.3.3 - Implement procedure and strategy changes as indicated by the lessons learned review conducted
3. OPPD commits to complete actions 4.5.1.14 and 4.5.1.15 (tracked through 4.5.3.06) detailed in the Flooding Recovery Action Plan, “Perform HELB [High Energy Line Break] analysis of Auxiliary Steam in the Auxiliary Building” and “Implement resolution of Auxiliary Steam piping in the Auxiliary Building.”
4. OPPD commits to:
- Evaluate the structural design margin for the containment internal structures, and reactor cavity and compartments, and resolve any deficiencies in accordance with its corrective action program (CAP).
  - Regarding Beam 22A and Beam 22B in the containment internal structures, resolve any deficiencies in accordance with the CAP.
  - Regarding the reactor head stand, prior to the next use of the reactor head stand, OPPD will evaluate the structural design margin for the head stand and resolve any deficiencies in accordance with the CAP.

This CAL does not modify or amend OPPD's license. Issuance of this CAL does not preclude the issuance of an order formalizing the above commitments or requiring other actions on the part of OPPD; nor does it preclude the NRC from taking enforcement actions for violations of NRC requirements that may have prompted the issuance of this letter.

Pursuant to Section 182 of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2232), you are required to:

L. Cortopassi

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1. Notify me immediately if your understanding differs from that set forth above;
2. Notify me if for any reason you cannot complete the actions in the timeframe that these items are currently planned to be resolved in the CAP; and
3. Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

In accordance with 10 CFR 2.390 of the NRC's regulations, a copy of this letter and any written notification/correspondence pertinent to the notification requirements outlined above will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/readingrm/adams.html> (the Public Electronic Reading Room). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Please contact Michael Hay at (817) 200-1147 if you have any questions concerning this letter.

Sincerely,

/RA/

Marc L. Dapas  
Regional Administrator

Docket No.: 50-285  
License No.: DPR-40

cc: Electronic Distribution for Fort Calhoun Station

L. Cortopassi

ADAMS ACCESSION NUMBER: **ML13351A395**

ADAMS	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> SUNSI Review Complete	Reviewer Initials: MCH
<input checked="" type="checkbox"/> Publicly Available	<input type="checkbox"/> Non-publicly Available	<input type="checkbox"/> Sensitive	<input checked="" type="checkbox"/> Non-sensitive	
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