



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

October 2, 2014

LICENSEE: Omaha Public Power District (OPPD)
FACILITY: Fort Calhoun Station
SUBJECT: MEETING SUMMARY OF SEPTEMBER 25, 2014, WITH OMAHA
PUBLIC POWER DISTRICT

On September 25, 2014, a Category 1 meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and Omaha Public Power District (OPPD) at the Omaha Marriott located at 10220 Regency Circle, Omaha, Nebraska.


The NRC presented the status of Inspection Manual Chapter 0350 oversight activities at Fort Calhoun Station and the Omaha Public Power District presented details of their actions for continued performance improvements following the plant restart in December 2013. Additionally, the NRC explained the basis for the decision to maintain Fort Calhoun Station in the Inspection Manual Chapter 0350 oversight process pending improvements in the licensee's implementation of the corrective action program. The slide presentations are available electronically from the NRC's Agency wide Documents Access and Management System (ADAMS) and are enclosed in this notice. A video of the public meeting will be posted on the web site devoted to the special oversight at Fort Calhoun Station, available at: <http://www.nrc.gov/info-finder/reactor/fcs/special-oversight.html>.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agency wide Documents Access and Management System (ADAMS). ADAMS is accessible from the Public Electronic Reading Room page of the NRC's public web site at: <http://www.nrc.gov/readingrm/adams.html>.

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Docket No.: 50-285

Enclosure 1:
NRC Presentation Slides
Enclosure 2:
OPPD Presentation Slides



**Fort Calhoun Station
Public Meeting**

Nuclear Regulatory Commission
September 25, 2014
Omaha, Nebraska


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Opening Remarks

Marc Dapas – Regional Administrator

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Introductions

- Welcome
- Introduction of NRC personnel


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NRC Actions Completed

- NRC issued Post-Restart Confirmatory Action Letter December 17, 2013
 - Key areas for sustained performance improvement
 - Human Performance
 - Safety Culture
 - Corrective Action Process
 - Design Basis Reconstitution


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Purpose of Meeting

- NRC will present status of regulatory activities associated with the Fort Calhoun Station
- OPPD will present details of Fort Calhoun Station performance improvement initiatives
- Public comments and questions


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NRC Assessment Activities

- Routine inspections
 - Resident Inspectors
 - Regional inspections
- Team inspection conducted July 2014
 - Assessed Corrective Action Process effectiveness
 - Assessed Post-Restart Confirmatory Action Letter items

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NRC Assessment Results

- Licensee effectively implementing improvement initiatives in the following key areas:
 - Organizational Effectiveness, Safety Culture, Safety Conscience Work Environment
 - Site Operational Focus
 - Procedures
 - Nuclear Oversight
 - Transition to the Exelon Nuclear Management Model

Approximately 130 of 180 Confirmatory Action Letter items closed


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In Summary

- Increased NRC oversight activities remain
- NRC continues to implement independent and thorough inspection activities to assess station performance improvement progress

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NRC Assessment Results

- Inconsistent effective implementation of corrective action program
- Examples include:
 - Evaluations of degraded and non-conforming conditions
 - Resolution of previously issued NRC findings


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OPPD Presentation

Lou Cortopassi
Site Vice-President / Chief Nuclear Officer
Omaha Public Power District

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In Summary

- Criteria for transitioning Fort Calhoun Station to the normal NRC oversight process
 - an effective long-range improvement program
 - sufficiently implementing the corrective action program
 - demonstrated safe plant operation and overall improving performance
 - controls in place to address the plant-specific issues that resulted in increased oversight

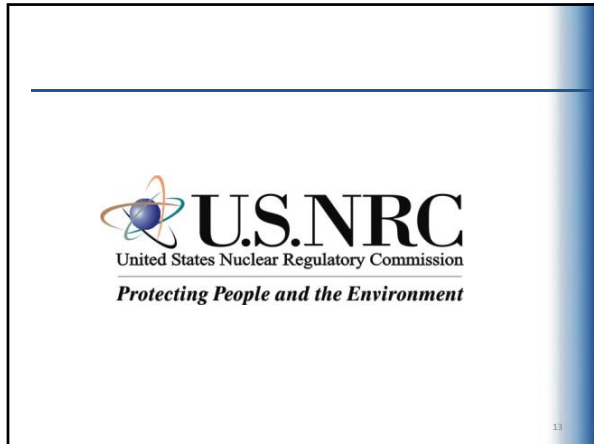
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Contacting the NRC


- Report an emergency
 - (301) 816-5100 (call collect)
- Report a safety concern
 - (800) 695-7403
 - Allegation@nrc.gov
- General information or questions
 - www.nrc.gov

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OPPD's Fort Calhoun Station Driving to Excellence

Public meeting with the U.S. Nuclear Regulatory Commission

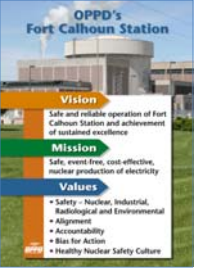



Sept. 25, 2014



Topics for Discussion

- Plant Status
- Problem Identification and Resolution
- Engineering Corrective Action Program
- Design & Licensing Basis Reconstitution
- Confirmatory Action Letter Commitment Status
- Nuclear Oversight
- Closing Remarks






Industrial Safety

- Observation of Plant Metrics
 - Industrial Safety

Injury Comparison Summary

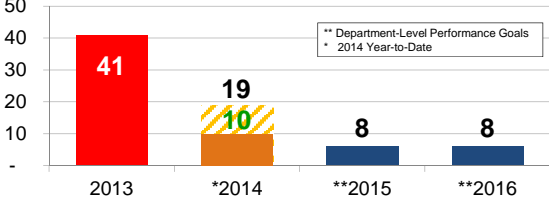
	2014	2013
Untreated Injuries:	7	11
First Aid Injuries:	1	15
Occupational Safety and Health Administration (OSHA) Recordable:	1	4
Lost-Time / Restricted:	0	4


Plant Status

- Observation of Plant Metrics
 - Human Performance

Department-Level Performance

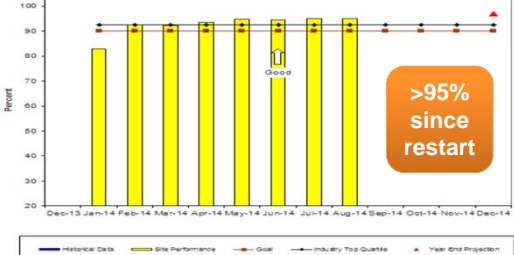


Industry best is in the range of 6 to 12 per year




Plant Status

Cumulative Capacity Factor






>95% since restart




Plant Status

- Plant Maneuver (Conservative Bias)
 - Heavy rains caused the Missouri river to rise to 1,001' 2" (June 21, 2014)
 - Station implemented contingency actions
 - Outage Control Center (OCC) staffed, incident commanders established
 - Water management equipment staged (sand bags, berms)
 - Moved unit to 28% in preparation for river level >1,004'
 - Conducted post-task critique/assessment for lessons learned


Problem Identification and Resolution

- FCS performance for NRC PI&R Inspection**
 - Many improvements made in Corrective Action Program (CAP)
 - Training and qualification of workers
 - More detailed metrics and performance indicators
 - Improved ownership and accountability behaviors in most functional areas
 - Results show continued improvement is needed
 - A need for improved ownership and accountability behaviors in select functional areas
 - More rigorous evaluation to determine causes of issues
 - Improved timeliness of corrective actions
 - Ensure actions taken completely address the issue to prevent recurrence
 - Better tracking of actions associated with higher level issues
 - Comprehensive self-assessments had not identified some improvement items
 - Self-assessment deficiencies sometimes had not been entered into CAP




PI&R – Actions to Date

- Site focus team assembled to address issues identified by the PI&R Team
 - Re-perform/revalidate analysis/evaluation of each issue
 - Continuous oversight by FCS, OPPD and Exelon corporate leaders
 - Daily meetings and status reporting
 - Elevated accountability for complete resolution of issues
 - 9 of 23 issues resolved to date
- Investigations into WHY we had performance challenges
 - Common factors analysis of all issues and precursors
 - Root cause analysis for repeat issues
 - Focused apparent cause analyses in Engineering and Operations




PI&R – Performance Analysis

- Common Factors Analysis**
 - Majority of issues were in Design Engineering
 - Many associated with site design and licensing basis issues
 - Did not show a broader station-wide weakness in CAP
- Root Cause Analysis shows that improvement is needed in:**
 - Accountability behaviors by workers and leaders
 - Follow-up to ensure response adequately addressed issue and restored compliance
 - Process for tracking NRC issues and commitments strengthened
 - Oversight of process and results by leaders
- Engineering Apparent Cause Analysis is in process**



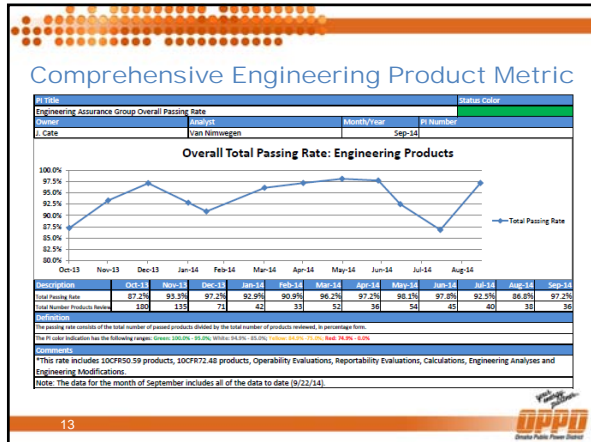
PI&R – Corrective Actions

- Process**
 - Established closure review board for higher level issues resolution
 - Station PI&R processes are being implemented into the Exelon Management Model
 - Departmental corrective action review boards for other CAP products
 - Additional oversight at site Management Review Committee
 - Oversight by the Engineering Assurance Group
 - Extent of Condition review for previous regulatory issues
- Behaviors**
 - Station-wide focus on fundamental behaviors to improve organizational accountability and rigor
 - Ownership of higher level issues elevated to Director level
 - Additional engineering manager added for CAP focus
 - Daily observation/feedback of PI&R processes



	Engineering Aug. 2013	Engineering Aug. 2014	
Coding and Analysis (trending)	Event Code Backlog (1 month)		
	Number of CRs Coded with Adverse Trend (1 month)		
	Cause Code Backlog (1 month)	2	4
Overall	Number of Significant Events (1 year)		
	Number of CRs Identified (1 month)	188	87
Identification and Screening Meetings	3 Month Engagement Ratio	64%	63%
	Self-Identification Ratio - Level 1,2,3 CRs (1 month)	60%	33%
	Number of CAP Meeting Observations (1 month)	0	0
Analysis	Number of Repeat Events (1 year)	0	0
	Number of Ineffective Effective Reviews for Root Causes Only (1 month)	1	0
	DCARB RCA Rejection Rate (3 month avg.)	13%	0%
	DCARB ACA (Tier 1) Rejection Rate (3 month avg.)	43%	0%
	DCARB ACA (Tier 2) Rejection Rate (3 month avg.)	43%	13%
	RCA Rejection Rate (3 month avg.)	67%	0%
	ACA (Tier 1) Rejection Rate (3 month avg.)	0%	50%
	DCARB CR Closure Rejection Rate (3 month avg.)	21%	10%
MRC CR Closure Rejection Rate (3 month avg.)	15%	27%	

	Engineering Aug. 2013	Engineering Aug. 2014	
Timeliness	Overdue Priorities (1 month)	25	0
	Number of Overdue Non-ACA and Non-RCARE's (1 month)	6	0
	Number of Overdue Corrective Actions (3 month total)	6	0
	Number of Overdue Simple Causes (1 month)	0	0
	Average Time to Perform RCA's (12 month avg.)	123	0
	Average Time to Perform Tier 1 ACA's (1 month avg.)	0	0
	Average Time to Perform Tier 2 ACA's (1 month)	231	28
	Average Time to Perform Simple Causes (1 month)	15	10
	Median Age of Open Non-Outage AI's (days) (1 month)	1,042	1,224
	Number of Open Non-Outage AI's > 365 days (1 month)	340	941
	Oldest Open Non-Outage AI (days) (1 month)	2,083	2,448
	Number of Open Outage-Related AI's (1 month)	191	88
	Number of Open CAPR's (1 month)	17	10
	Number of Open CA's (1 month)	1,778	811
	Number of Open RE's (1 month)	438	91
	Median Age of Open RA's (days) (1 month)	848	1,029
	Number of Open RA's > 365 days (1 month)	342	264
CRs in Ready to Close (1 month)	1,178	131	



- ### Problem Identification and Resolution
- Several of the PI&R inspection violations were due to inadequate implementation of the operability determination program
 - Causes:
 - Lack of rigor in immediate determination of operability
 - Competing priorities during execution of shift activities
 - Incomplete information provided in the condition report
 - Corrective Actions:
 - Reinforced importance of accurate and timely operability determinations
 - Reprioritized operator workload and revised roles/responsibilities to allow greater focus on operability determination
 - Developing template/job aid for those who generate condition reports so information can be reviewed efficiently and effectively
 - Implemented quality review board to screen and provide feedback on completed operability determinations
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- ### 2014 Engineering Activities
- Station Flooding Hazard re-analysis
 - Design and Licensing Basis Reconstitution project commenced
 - Containment Internal Structure
 - Reactor Headstand and Support Beams
 - Safety Injection Flow Balance License Amendment Request (LAR) submitted
 - ASME Piping Code LAR submitted
 - High-Energy Line Break calculations
 - Outage Preparations
-
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- ### Design and Licensing Basis Control and Use
- Project Activities Completed or In Progress
 - Jan. 2014: Commenced drafting project request for proposal (COMPLETE)
 - Feb. 7: Issue project request for proposal to vendors (COMPLETE)
 - March 28: Vendor proposals due (COMPLETE)
 - April 30: Award project contract (COMPLETE)
 - May 5: Commence project (COMPLETE)
 - June 30: Complete Phase 1 (Develop project processes/procedures) (COMPLETE)
 - July 1: Commence Phase 2 (Pilot Project) (COMPLETE)
 - July 31: Complete review of post-restart list of key calculations (COMPLETE)
 - No safety concerns have been identified, but 223 calculations require upgrade to today's standards
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- ### Design and Licensing Basis Control and Use
- Project Activities to be Completed
 - Dec. 31, 2014: Complete Phase 2 (Pilot project – NRC commitment) (IN PROGRESS & ON SCHEDULE)
 - 10 OPPD & 11 vendor personnel working on pilot project
 - Feb. 28, 2015: Complete Phase 3 (Incorporate lessons from pilot program)
 - Dec. 31, 2018: Complete Phase 4 (Full reconstitution – NRC commitment)
 - 10+ OPPD & 28 vendor personnel slated to work on production phase of project
 - Priority USAR sections to be reviewed in 2015:
 - USAR 14 sections (accident analysis/response) (24 sections)
 - USAR 6.2 (Engineered Safeguards)
 - USAR 8.4 (Emergency Power Sources)
 - USAR 8.3 (Station Electrical Distribution Systems)
 - USAR 9.4 (Auxiliary Feedwater System)
 - USAR 9.7 (Component Cooling Water System)
 - USAR 9.12 (Instrument Air System)
 - USAR 9.10 (Ventilation Systems)
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- ### MC 0350 CAL Status
- The NRC closed five sections of the Post-Restart Corrective Action Letter (CAL). They are:
 - Section 1 – Organizational Effectiveness, Safety Culture and Safety-Conscious Work Environment
 - Section 5 – Site Operational Focus
 - Section 6 – Procedures
 - Section 9 – Nuclear Oversight
 - Section 10 – Transition to the Exelon Nuclear Management Model and Integration into the Exelon Nuclear Fleet
 - 130 of 180 CAL total action items
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MC 0350 CAL Status

- Open sections of the Post-Restart CAL. They are:
 - Section 2 – Problem Identification and Resolution
 - Open pending ongoing actions to implement the Recovery Plan for Learning Programs functional areas, which includes Problem Analysis and Issue Resolution
 - Section 3 – Performance Improvement and Learning Programs
 - Section 4 – Design and Licensing Basis Control and Use
 - Section 7 – Equipment Performance
 - Open pending final effectiveness review of Plant Health Committee process and performance
 - Open pending ongoing actions to implement cables and connections program
 - Section 8 – Programs
 - Open pending NRC review of Licensee Amendment Request 14-04 Revise Current Licensing Basis to Adopt a New Piping Design Code
 - Open pending assessment of corrective actions associated with Operability Determinations




Nuclear Oversight Independent Assessment

Plant Observations and Trends



Closing Remarks

- Plant Status
- Problem Identification and Resolution
- Engineering Corrective Action Program
- Design & Licensing Basis Reconstitution
- Confirmatory Action Letter Commitment Status
- Nuclear Oversight
- Closing Remarks




OPPD's Fort Calhoun Station

Vision
Safe and reliable operation of Fort Calhoun Station and achievement of sustained excellence

Mission
Safe, event-free, cost effective, nuclear production of electricity

Values

- Safety – Nuclear, Industrial, Radiological and Environmental
- Alignment
- Accountability
- Bias for Action
- Healthy Nuclear Safety Culture



October 2, 2014

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Memo to Omaha Public Power District from Michael Hay dated October 2, 2014

SUBJECT: MEETING SUMMARY OF SEPTEMBER 25, 2014, WITH OMAHA PUBLIC
POWER DISTRICT

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