

April 10, 2003

LICENSEE: Omaha Public Power District
FACILITY: Fort Calhoun Station, Unit 1
SUBJECT: SUMMARY OF TELECOMMUNICATION WITH OMAHA PUBLIC POWER DISTRICT (OPPD) TO DISCUSS DRAFT REQUESTS FOR ADDITIONAL INFORMATION (RAIs) FOR THE RENEWAL OF THE OPERATING LICENSE FOR FORT CALHOUN STATION, UNIT 1 (FCS)

On October 28 and 31, 2002, the NRC staff (the staff) and representatives from OPPD held a telecommunication (telecon) to discuss RAIs resulting from the staff's review of license renewal application (LRA) Sections 2.4.2.5, 3.1, 3.2, 3.4, 3.5, and B.2.3. A list of telecon participants is enclosed. OPPD has had an opportunity to review and comment on this summary.

2.4.2.5 Fuel Handling Equipment and Heavy Load Cranes

2.4.2.5-2 LRA Table 2.4.2.5-1 identifies the spent fuel storage racks as having an intended function of providing structural support to Critical Quality Element (CQE) reactivity control. However, the staff, after review of USAR Section 9.5.1.2, "Prevention of Criticality During Transfer and Storage," found that boron panels protected with stainless steel were attached to the racks to support the prevention of criticality in the spent fuel pool. The staff finds that the passive, long-lived boron panels and their stainless steel covering should be included within the scope of license renewal and subject to an aging management review (AMR), or the applicant should provide a justification for their exclusion. Additionally, the staff finds that the boron panels and the spent fuel storage rack arrangement support the prevention of criticality within the spent fuel pool. As a result, they perform an intended function of preventing criticality. The intended function of preventing criticality is not included within LRA Table 2.4.2.5-1. If it should not be included, the applicant should provide its justification for excluding the intended function of preventing criticality from LRA Table 2.4.2.5-1.

Telecon Discussion:

OPPD had no questions with this RAI, and stated that LRA Table 2.4.2.5-1 identifies reactivity control as an intended function of the spent fuel storage racks, and stated that this intended function is the same as criticality. The staff will not require OPPD to respond to this portion of the RAI. However, as discussed in the RAI, the staff still finds that the passive, long-lived boron panels and their stainless steel covering should be included within the scope of license renewal and subject to AMR, or the applicant should provide a justification for their exclusion. The RAI response should address this.

3.1 Reactor Coolant Systems

3.1-2 Table 3.1-1 in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," summarizes the aging effects and aging management programs (AMPs) for reactor vessel, internals, and reactor coolant system components evaluated in Volume (Vol.) 2 of the GALL Report, NUREG-1801. Table 1 in Vol. 1 of NUREG-1801 identifies the item numbers in GALL that the group represents. The GALL item number identifies the component, its material, environment, aging effects/mechanisms, and AMP to manage the aging effect. Therefore, when an applicant indicates that the AMR results are consistent with those reviewed and approved in NUREG-1801, they are inferring that all the components associated with the component group were evaluated by the applicant and contain materials, operate in an environment, are susceptible to aging effects/mechanisms, and have AMPs that are consistent with those reviewed and approved in NUREG-1801. The staff is concerned that this conclusion does not apply to all GALL items that are listed in Table 1 in Vol. 1 of NUREG-1801.

Table 3.1-1 of your application indicates that the bolting program is the AMP for components identified as Items 3.1.1.19, 3.1.1.23, and 3.1.1.36. The bolting integrity program (LRA Section B.1.1) indicates, "The scope of the FCS Bolting Integrity Program includes those plant-specific components identified in LRA Tables 3.1.2 and 3.5.2 of this application for which the Bolting Integrity Program is identified as an aging management program." However, the LRA does not state that the scope of the program includes plant-specific components identified in LRA Table 3.1-1.

The applicant is requested to clarify this apparent discrepancy. In addition, the applicant is requested to confirm that when the application indicates that a row number item identified in LRA Table 3.1-1 is consistent with NUREG-1801, all the GALL item numbers in Table 1 of Vol. 1 of NUREG-1801 were evaluated by the applicant and they contain materials, operate in an environment, are susceptible to aging effects/mechanisms, and have AMPs that are consistent with those reviewed and approved for the GALL item numbers in Table 1 of Vol. 1 of NUREG-1801. If this is not true, identify all reactor vessel, internals, and reactor coolant system components that you indicate are consistent with NUREG-1801, but do not contain materials, operate in an environment, are susceptible to aging effects/mechanisms, or have AMPs that are consistent with those reviewed and approved for GALL item numbers in Table 1 of Vol. 1 of NUREG-1801.

Telecon Discussion:

OPPD had no questions with this RAI. With regard to the staff's request to clarify the discrepancy between the program scope description in AMP B.1.1 and the reference to AMP B.1.1 in LRA Table 3.1-1, OPPD stated that their response to this RAI will clarify their assumption that components evaluated in GALL and

identified in LRA Table 3.1-1 as being managed by AMP 3.1-1 were within the scope of AMP B.1.1, and as a result, the AMP description need not include a specific reference to components in LRA Table 3.1-1. Further, the response to this RAI will note that the above-mentioned assumption was not only used for AMP B.1.1, but for all GALL AMPs credited with managing components evaluated in GALL and identified in LRA Tables 3.2-1, 3.3-1, 3.4-1, 3.5-1, and 3.6-1. Finally, because other RAIs addressed this issue for components in other system groups, OPPD's responses to these RAIs will refer to the response to this RAI.

With regard to the staff's request to confirm the meaning of consistency, as stated in the LRA, OPPD stated that, in response to this RAI, they will clarify that when the LRA states that the applicant is consistent with GALL in any 3.X-1 Table in the LRA, that this means that FCS has the same component, with the same material, exposed to the same environment, experienced the same aging effect, and managed by the same AMP, as that evaluated in GALL. Any components not evaluated in GALL, or that were evaluated in GALL, but have materials, environments, aging effects, or AMPs, that are different from those evaluated in GALL are not identified in LRA Table 3.X-1, but are, instead, identified in LRA Tables 3.X-2 or 3.X-3. Further, if any other RAIs address this same issue, OPPD's response will reference their response to this RAI.

3.2 Engineered Safety Features

3.2.1-2 LRA Table 3.2-1, Row Number 3.2.1.12, indicates that for closure bolting in high pressure or high temperature systems, bolting integrity is the AMP for the identified aging effects of loss of material due to general corrosion, loss of preload due to stress relaxation, and crack initiation and growth due to cyclic loading or stress corrosion cracking (SCC). The applicant stated in LRA Appendix B that the FCS bolting integrity program (LRA Section B.1.1) is consistent with XI.M18, "Bolting Integrity," as identified in NUREG-1801 with the following exception: "FCS has not identified stress corrosion cracking (SCC) as a creditable aging effect requiring management for high strength carbon steel bolting in plant indoor air. FCS will utilize ASME Section XI, Subsection IWF visual VT-3 inspection requirements rather than volumetric inspections for inspection of supports."

The applicant is requested to provide a basis on which to conclude that SCC will not have to be considered as a creditable aging effect requiring management, considering the potentially high pressure or high temperature environment of moisture, humidity, and leaking fluid. Also, in view of the examination methods specified in XI.M18, which include VT-1 and volumetric examination as methods of inspection, in accordance with the requirements of Section XI, Subsections IWB and IWC, the applicant is requested to address the adequacy of using VT-3 visual examination of Subsection IWF, to detect the above-identified aging effects of loss of material, loss of preload, and cracking.

Telecon Discussion:

OPPD had no questions with this RAI, and stated that they will provide the basis for their conclusion that SCC is not a creditable aging effect requiring management for high-strength carbon steel bolting in plant indoor air. In addition, the RAI response will provide the basis for OPPD's conclusion to use visual VT-3 inspections for supports instead of VT-3 and volumetric inspections for supports.

Finally, if other RAIs address this issue, OPPD's responses to those RAIs will reference the response to this RAI.

- 3.2.1-3 In LRA Table 2.3.2.1-1, for heat exchanger, Row Number 3.2.3.01 is listed under Aging Management Review Results. In LRA Table 3.2-3, Row Number 3.2.3.01 is shown to cover such components as safety injection tanks, flow element and orifice bodies, orifice plate, tubing, and heat exchangers. Also, Row Number 3.2.1.10 is referenced under the applicable NUREG-1801 Aging Management Review Results. However, in a review of NUREG-1801 (Vol. 1) Table 2, and NUREG-1801 (Vol. 2), Chapter V, the staff failed to identify heat exchanger as a component to be linked to Row Number 3.2.1.10. The applicant is requested to discuss this apparent discrepancy, and provide the correct justification for crediting the GALL program AMR for managing aging in the safety injection and containment spray heat exchangers.

Telecon Discussion:

Subsequent to the issuance of this RAI, the staff has reconsidered whether the applicant needs to respond to this RAI. Specifically, the staff has determined that the justification for OPPD's determination that the heat exchangers in LRA Table 2.3.2.1-1 clearly identifies the basis for their conclusion that the aging management of the subject heat exchangers is in accordance with the AMR results for Item 3.2.1.10 in LRA Table 3.2-1, and that the material, environment, aging effects, and AMPs are the same as those evaluated in GALL Vol. 2, V.D1.1-a. As a result, the staff has determined that OPPD need not respond to this RAI.

3.4 Steam and Power Conversion Systems

- 3.4.1-3 LRA Table 3.4-1, Row 3.4.1.08, discusses aging management of closure bolting, and credits the bolting integrity program (LRA Section B.1.1) for managing loss of material and crack initiation, with one exception. LRA Section B.1.1 states that the bolting integrity program will be consistent with GALL program XI.M3, "Reactor Head Closure Studs," and XI.M18, "Bolting Integrity," with the exception that SCC has not been identified as a creditable aging effect for high-strength carbon steel bolting in plant indoor air. The reviewer requests the applicant to discuss the basis for its conclusion that SCC is not a creditable aging effect for bolting.

Telecon Discussion:

OPPD stated that they will respond to this RAI by referring to the response to RAI 3.2.1-2.

- 3.4.1-5 It is stated in LRA Table 3.4-1, Row number 3.4.1.05, that the group includes carbon and low alloy steel in ambient air. The statement implies that other materials and environments are covered in this group. Please identify those materials and environments. Also, for the ambient air environment, provide the range of humidity and moisture content.

Telecon Discussion:

OPPD stated that they will respond to this RAI by clarifying that only carbon and low alloy steel in ambient air are the only materials and environments covered by Item 3.4.1.05. Also, the response will note that humidity (which OPPD and the staff assume is the same as moisture content) is not used as a basis for excluding an aging effect; i.e., any plausible aging effects are managed that result from exposure of these components to moisture.

- 3.4.1-6 LRA Tables 2.3.1.1-1 and 2.3.4.2-1 identify components, intended functions, and AMR results for the feedwater and the auxiliary feedwater (AFW) systems, respectively. Item 3.4.1.08 in the AMR results column for bolting in these systems leads to the aging management of loss of material due to general corrosion, crack initiation, and growth due to cyclic loading and/or SCC in closure bolting in LRA Table 3.4-1. The aging effect is stated to be managed by the bolting integrity program. However, the scope of this program as discussed in LRA Section B.1.1, does not include LRA Tables 3.4-1, 3.4-2, or 3.4-3. Provide clarification for this discrepancy.

Telecon Discussion:

OPPD's response to this RAI will reference their response to the RAI 3.1-2.

- 3.4.1-7 LRA Tables 2.3.4.1-1 (Feedwater), 2.3.4.2-1 (AFW), and 2.3.4.3-1 (Main steam and Turbine steam extractions) identify Item 3.4.1.13 for AMR results of bolting. In LRA Table 3.4-1, row number 3.4.1.13, it is stated that the boric acid corrosion prevention program would manage the aging effect of loss of material due to boric acid corrosion in bolting. However, the steam and power conversion system has not been identified as being within the scope of the boric acid corrosion program, as discussed in LRA Section B.2.1. Provide clarification for this discrepancy.

Telecon Discussion:

OPPD's response to this RAI will reference their response to the RAI 3.1-2.

3.4.1-9 LRA Table 2.3.4.2-1, which lists components subject to AMR for the AFW system, refers to Items 3.4.1.02 and 3.4.1.05 for AMR results for tanks. These links in LRA Table 3.4-1 lead to the chemistry program (B.1.2), one-time inspection program (B.3.5), and general corrosion for external surfaces program (B.3.3). However, the one-time inspection program (B.3.5) does not have LRA Table 3.4-1 within its scope and, therefore, excludes tanks in the AFW system. Provide clarification for this discrepancy.

Telecon Discussion:

OPPD's response to this RAI will reference their response to the RAI 3.1-2.

3.4.1-14 The piping and fittings in the feedwater system are subject to wall thinning due to flow accelerated corrosion (FAC) as indicated in LRA Tables 2.3.4-1 and 3.4-1, row 3.4.1.06. This aging effect is managed by the FAC program in LRA Appendix B.1.5. However, the scope of this program does not include LRA Table 3.4-1, indicating that piping and fittings in the feedwater system are excluded from the FAC program. Provide clarification for this discrepancy. Also, NUREG-1801, Vol. 2, VIII D2.3-a and VIII D2.3.2 recommends the FAC program for the feedwater pump (steam turbine and motor driven) suction and discharge lines. Clarify the exclusion of these components from LRA Table 2.3.4-1.

Telecon Discussion:

OPPD's response to this RAI will reference their response to the RAI 3.1-2. In addition, with regard to the apparent discrepancy, subsequent to the issuance of this RAI, the staff has reconsidered whether the applicant needs to respond to this RAI. Specifically, the staff has determined that NUREG-1801, Volume 2, items VIII D2.3-a and VIII D2.3.2, refer to BWRs and, therefore, are not applicable to FCS. Therefore, OPPD need not respond to this part of the RAI.

3.4.3-2 Discuss how the boric acid corrosion program would manage the aging effect of loss of material due to boric acid corrosion for filters and strainers such that the intended function of filtration is maintained, since an acceptable level of corrosion from a structural integrity point of view could degrade the intended function of filtration.

Telecon Discussion:

OPPD clarified that the boric acid corrosion program manages aging associated with external exposure of material to boric acid. Therefore, this is an external aging effect. With regard to maintaining the filtration function (a component function that is internal to the system), OPPD clarified that management of aging in filters and strainers in the AFW system is ensured through several processes, including two that credit GALL AMR results. Specifically, Items 3.4.3.01 and 3.4.3.02 of LRA Table 3.4-3 provide justification for crediting GALL AMR results found in LRA Table 3.4-1, Items 3.4.1.04 and 3.4.1.02, respectively. The basis for crediting these GALL AMRs is that the materials, environments, aging

effects, and AMPs are the same as those evaluated in GALL. Similarly, OPPD justifies the aging management of several of the aging effects associated with the filters/strainers in the main steam and turbine steam extraction system by noting that these components are of the same material, exposed to the same environment, and subject to the same aging effects as those found in the AMR results for LRA Table 3.4-1 Items 3.4.1.02 and 3.4.1.06 and their associated items in GALL (VIII.G4-b and VIII.B1.1-c, respectively). As a result of these clarifications, the staff concluded that OPPD need not respond to this RAI.

3.5 Structures

3.5-1 Each row entry in LRA Table 3.5-1 identifies an AMP for each aging effect/mechanism in the table. However, for many of the row entries in LRA Table 3.5-1, the 'Discussion' column concludes that the aging effect/mechanism is not applicable for the component(s) at FCS. Although the aging effect/mechanism may not have been observed to date at FCS, the staff considers the inspection for that aging effect during the period of extended operation through an AMP to be appropriate in many cases. Provide clarification as to whether the aging effects, identified for the following row entries in LRA Table 3.5-1, will be managed during the period of extended operation by the AMP that is listed with the row entry:

<u>Row Entry</u>	<u>Aging Management Program</u>
3.5.1.07	Containment ISI
3.5.1.10	Plant-specific
3.5.1.12	Containment ISI and Containment Leak Rate Test
3.5.1.16	Structures Monitoring
3.5.1.17	Plant-specific
3.5.1.22	Plant-specific

Telecon Discussion:

OPPD stated that their RAI response will clarify that, although not all aging effects identified in the row entries identified above were observed at FCS, the associated AMPs would be credited with managing the aging effects. OPPD also stated that they would clarify in this response that this aging management approach applies not only to aging effects in the row entries identified above, but also to other aging effects throughout the LRA.

3.5.1-14 For interior containment concrete in ambient air and containment grout, LRA Table 3.5-1 row entries 3.5.1.15 and 3.5.1.16 are referenced. The 'Discussion' columns for these two row entries appear to contradict each other regarding the applicability of reaction with aggregates as an applicable aging mechanism, which leads to the aging effect cracking. Please clarify whether reaction with aggregates, and hence cracking, is considered to be applicable for interior containment concrete in ambient air and containment grout.

Telecon Discussion:

OPPD stated that their aging management approach to components in these row entries is the same as that in response to RAI 3.5-1. Specifically, OPPD stated that, regardless of the aging effect and whether it was observed at FCS, OPPD will credit the appropriate AMP with managing the aging effect.

- 3.5.1-15 The 'Discussion' column for row entry 3.5.1.07 in LRA Table 3.5-1 appears to indicate that the identified aging effects (change in material properties, cracking, and loss of material) for concrete elements (foundation, walls, and dome) are not applicable at FCS for below-grade concrete components. This same row entry (3.5.1.07) is also referenced for a number of above-grade concrete components listed in LRA Section 2.4, "Scoping and Screening Results: Structures." Clarify whether the aging effects (change in material properties, cracking, and loss of material) for this row entry will or will not be managed for above-grade concrete components.

Telecon Discussion:

OPPD stated that their aging management approach to components in these row entries is the same as in response to RAI 3.5-1. Specifically, OPPD stated that, regardless of the aging effect and whether it was observed at FCS, OPPD will credit the appropriate AMP with managing the aging effect.

- 3.5.1-16 The 'Discussion' column for row entry 3.5.1.16 in LRA Table 3.5-1 of the LRA indicates that freeze-thaw, which leads to the aging effect cracking, is not an applicable aging mechanism for concrete components at FCS. However, row entry 3.5.1.15 in LRA Table 3.5-1 appears to indicate that cracking resulting from freeze-thaw or reaction with aggregate is an applicable aging effect. Please clarify this discrepancy.

Telecon Discussion:

OPPD stated that their aging management approach to components in these row entries is the same as in response to RAI 3.5-1. Specifically, OPPD stated that, regardless of the aging effect and whether it was observed at FCS, OPPD will credit the appropriate AMP with managing the aging effect.

- 3.5.1-18 In LRA Table 2.4.2.6-1 for component supports, AMR result 3.5.1.28 in LRA Table 3.5-1 is referenced for the lubrite plate in ambient air. Provide clarification regarding the applicability of this row entry for the lubrite plate in ambient air. Specifically, identify the applicable aging effects for lubrite in ambient air and the programs credited with managing the aging effects.

Telecon Discussion:

The staff stated its belief that only loss of mechanical function is a plausible aging effect for lubrite (low-alloy steel). OPPD stated they will determine whether lubrite is also susceptible to loss of material.

B.2.3 Diesel Fuel Monitoring and Storage

B.2.3-3 It is stated under "Parameters Monitored/Inspected," that particulate analysis of fuel oil is performed, but is not credited for aging management. The staff requests the applicant to confirm whether the diesel fuel oil quality is monitored for water and sediment contamination in accordance with American Society for Testing and Materials (ASTM) Standards D1796 and D2709, as stated in XI.M30 of the GALL Report.

Telecon Discussion:

OPPD noted that the discussion of ASTM Standards D1796 and D2709 in GALL AMP XI.M30 can be interpreted to expect an applicant to utilize the guidance in both of these ASTM standards when only the guidance in one or the other is also allowed. OPPD suggested that the AMP be revised to clarify that the guidance in D1796 or D2709 can be used. OPPD also stated that their RAI response will clarify that the guidance in D2709 is used at FCS.

/RA/

William F. Burton, Project Manager
License Renewal Section
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No.: 50-285

Enclosure: As stated

cc w/enclosure: See next page

Telecon Discussion:

The staff stated its belief that only loss of mechanical function is a plausible aging effect for lubrite (low-alloy steel). OPPD stated they will determine whether lubrite is also susceptible to loss of material.

B.2.3 Diesel Fuel Monitoring and Storage

B.2.3-3 It is stated under "Parameters Monitored/Inspected," that particulate analysis of fuel oil is performed, but is not credited for aging management. The staff requests the applicant to confirm whether the diesel fuel oil quality is monitored for water and sediment contamination in accordance with American Society for Testing and Materials (ASTM) Standards D1796 and D2709, as stated in XI.M30 of the GALL Report.

Telecon Discussion:

OPPD noted that the discussion of ASTM Standards D1796 and D2709 in GALL AMP XI.M30 can be interpreted to expect an applicant to utilize the guidance in both of these ASTM standards when only the guidance in one or the other is also allowed. OPPD suggested that the AMP be revised to clarify that the guidance in D1796 or D2709 can be used. OPPD also stated that their RAI response will clarify that the guidance in D2709 is used at FCS.

/RA/

William F. Burton, Project Manager
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Docket No.: 50-285

Enclosure: As stated

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OCTOBER 28 AND 31, 2002

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