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SAFEGUARDS INFORMATION

May 31, 2005
LIC-05-0056

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852

- Reference:
1. Docket No. 50-285
 2. Letter from Samuel L. Collins (NRC) to W. Gary Gates (OPPD) dated February 25, 2002, Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Fort Calhoun Station, Unit 1 (EA-02-026) (NRC-02-027)
 3. Letter from Ross T. Ridenoure (OPPD) to Document Control Desk (NRC) dated September 3, 2002, Report of Full Compliance with the Requirements of the Interim Safeguards and Security Compensatory Measures Order (LIC-02-0093)
 4. Letter from Samuel J. Collins (NRC) to John Sefick (OPPD) dated April 29, 2003, Issuance of Order Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors (EA-03-086) (NRC-03-087)
 5. Letter from J. E. Dyer (NRC) to Ross T. Ridenoure (OPPD) dated February 25, 2005, NRC Staff Guidance for Use in Achieving Satisfactory Compliance With February 25, 2002, Order Section B.5.b (NRC-05-0058)

SUBJECT: Response to NRC Guidance Regarding Mitigation Strategies

The NRC issued Reference 2 for Fort Calhoun Station Unit No. 1 (FCS) of the Omaha Public Power District (OPPD).

Reference 2 imposed requirements on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Reference 2 required licensees to implement certain changes in physical security plans and safeguards contingency plans on an interim basis until final requirements were established. OPPD stated that implementation of the requirements for Section II.B.5.b. of Reference 2 was complete in Reference 3.

Subsequently, the NRC issued Reference 4 and other security related Orders (collectively "Orders") for Fort Calhoun Station Unit No. 1 (FCS). In many ways, Reference 4 complemented or superseded requirements of the interim measures imposed by Reference 2.

Attachment Contains Safeguards Material. Decontrolled When Separated From Attachment.

As required by Reference 4, the plans for FCS have been implemented. Subsequently, OPPD was requested to respond to Reference 5 by May 31, 2005, and to implement appropriate enhancement to current mitigation strategies by August 31, 2005. Reference 5, Enclosure 2, *Developing Mitigating Strategies / Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order* (dated February 24, 2005) ("NRC B.5.b. Guidance"), asked OPPD to review the Areas of Consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the mitigating strategies deemed appropriate in accordance with Attachment B to that Enclosure.

Subsequently, the Nuclear Energy Institute ("NEI"), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use ("NEI Guidance") to assist licensees in responding to Reference 5.

As requested in Reference 5, OPPD has reviewed the information in Attachments A and B in accordance with the NEI Guidance and is hereby submitting, as a Safeguards Information attachment to this letter (Attachment 1), OPPD's evaluation of the information the NRC provided. Attachment 1 reflects the results of a comprehensive and thorough review of the guidance and describes the considerations that OPPD either has already implemented or intends to implement by August 31, 2005 at FCS.

The primary guiding principles used in the conduct of this evaluation were (1) whether or not equipment and resources were "readily available," and (2) if equipment is readily available, can it be effectively utilized in a licensee's mitigating strategy. OPPD considered "readily available" to mean that the equipment or resources were already licensee owned, under contract, or part of an existing Memorandum of Understanding. Further, even if equipment and resources are readily available, they are of no value if ineffective in implementing the mitigating strategy.

In accordance with these principles, mitigative strategies are being implemented to address the NRC B.5.b. Guidance. These actions are considered to be commitments for that purpose and will be managed in accordance with OPPD's commitment tracking system.

The following commitment is made with regards to the schedule for implementation of each of the items described in Attachment 1 of this submittal:

- OPPD will implement the relevant items in Attachment 1 of this submittal by August 31, 2005. (AR 36796)

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If you have additional questions, or require further information, please contact Thomas R. Byrne at (402) 533-7368.

Sincerely,



D. J. Bannister
Manager – Fort Calhoun Station

DJB/TRB/trb

Attachment 1 – Evaluations and Commitments

- c: J. E. Dyer, Office of Nuclear Reactor Regulation (w/o attachment)
B. S. Mallett, NRC Regional Administrator, Region IV (w/o attachment)
A. B. Wang, NRC Project Manager (w/o attachment)
J. D. Hanna, NRC Senior Resident Inspector (w/o attachment)

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