

June 27, 2006

Mr. R. T. Ridenoure  
Vice President - Chief Nuclear Officer  
Omaha Public Power District  
Fort Calhoun Station FC-2-4 Adm.  
Post Office Box 550  
Fort Calhoun, NE 68023-0550

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE FORT  
CALHOUN INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)  
(TAC. NO. L23984)

Dear Mr. Ridenoure:

By letter dated June 9, 2006, Omaha Public Power District (OPPD) submitted a request for exemption from Certificate of Compliance (CoC) No. 1004 for the Fort Calhoun Station independent spent fuel storage installation (ISFSI). The exemption request includes exemptions from Technical Specifications (TSs) 1.2.1, 1.2.11, and 1.2.17a associated with CoC No. 1004 for the Standardized NUHOMS<sup>®</sup> design. The exemption request also includes an exemption from 10 CFR 72.48(c)(2)(viii) to use a method of thermal analysis that is a departure from the methodology described in the Standardized NUHOMS<sup>®</sup> updated final safety analysis report. In my letter to you dated June 14, 2006, I acknowledged receipt of your amendment request and provided a proposed schedule for our review.

In connection with the staff's review, we need the information identified in the enclosure to this letter. We request that you provide this information by July 3, 2006. Inform us at your earliest convenience, but no later than July 3, 2006, if you are not able to provide the information by that date. To assist us in re-scheduling your review, you should include a new proposed submittal date and the reasons for the delay.

Please reference Docket No. 72-54 and TAC No. L23984 in future correspondence related to this request. The staff is available to meet to discuss your proposed responses. If you have any questions regarding this matter, I may be contacted at (301) 415-1132.

Sincerely,

*/RA/*

Joseph M. Sebrosky, Senior Project Manager  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards

Docket Nos. 72-54, 50-285  
cc: Mailing List

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 Vice President - Chief Nuclear Officer  
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OFC:	SFPO	SFPO	E	SFPO	SFPO	SFPO	SFPO
NAME:	JSebrosky	EZiegler		SHelton	LCampbell	RShewmaker	RNelson MRahimi for
DATE:	6/27/06	6/26/06		6/26/06	6/26/06	6/27/06	6/26/06

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Ft. Calhoun Station, Unit 1 Service List

cc:

Winston & Strawn  
ATTN: James R. Curtiss, Esq.  
1700 K Street, N.W.  
Washington, DC 20006-3817

Mr. Daniel K. McGhee  
Bureau of Radiological Health  
Iowa Department of Public Health  
Lucas State Office Building, 5th Floor  
321 East 12th Street  
Des Moines, IA 50319

Chairman  
Washington County Board of Supervisors  
P.O. Box 466  
Blair, NE 68008

Mr. John Hanna, Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 310  
Fort Calhoun, NE 68023

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-4005

Ms. Julia Schmitt, Manager  
Radiation Control Program  
Nebraska Health & Human Services R & L  
Public Health Assurance  
301 Centennial Mall, South  
P.O. Box 95007  
Lincoln, NE 68509-5007

Mr. David J. Bannister, Manager  
Fort Calhoun Station  
Omaha Public Power District  
Fort Calhoun Station FC-1-1 Plant  
P.O. Box 550  
Fort Calhoun, NE 68023-0550

Mr. Joe L. McManis  
Manager - Nuclear Licensing  
Omaha Public Power District  
Fort Calhoun Station FC-2-4 Adm.  
P.O. Box 550  
Fort Calhoun, NE 68023-0550

**REQUEST FOR ADDITIONAL INFORMATION  
FORT CALHOUN STATION  
DOCKET NUMBER 72-54**

By letter dated June 9, 2006, Omaha Public Power District (OPPD) submitted a request for exemption from Certificate of Compliance (CoC) No. 1004 for the Fort Calhoun Station independent spent fuel storage installation (ISFSI). The exemption request includes exemptions from Technical Specifications (TSs) 1.2.1, 1.2.11, and 1.2.17a associated with CoC No. 1004 for the Standardized NUHOMS® design. The exemption request also includes an exemption from 10 CFR 72.48(c)(2)(viii) to use a method of thermal analysis that is a departure from the methodology described in the Standardized NUHOMS® updated final safety analysis report. This request for additional information (RAI) identifies additional information needed by the U.S. Nuclear Regulatory Commission (NRC) staff in connection with its review of the application.

Each individual RAI describes information needed by the staff for it to complete its review of the application and/or the safety analysis report (SAR) to determine whether the applicant has demonstrated compliance with the regulatory requirements.

**RAI-1**

State the minimum cooling time of the assemblies that will be loaded under this exemption request.

The summary of the key parameters for Fort Calhoun Station's CE 14x14 fuel, provided in Table 1 of Attachment 1 of the exemption request, lists a number of fuel parameters, excepting the minimum cooling time of the assemblies.

This information is necessary to ensure that the dose rates in TS 1.2.11 are not exceeded and to satisfy the requirements of 10 CFR 72.44(c)(1), 72.106, and 72.126.

**RAI-2**

Clarify whether the OS197L transfer cask (TC) surface dose rate, 13 rem/hr, given on Page 12 of Attachment 1 of the exemption request is the maximum or average surface dose rate.

Transnuclear, Inc. Calculation No. 1121-0505, which determines the radiation dose rates around the OS197L TC in support of the exemption request, states in Section 6.2 that 13 rem/hr is the **maximum** TC surface dose rate. However, Page 12 of Attachment 1 states that 13 rem/hr is the **average** TC surface dose rate.

This information is necessary to satisfy the requirements of 10 CFR 72.11 and 72.106.

**RAI-3**

Clarify whether the reference to Chapter 11 of the updated final safety analysis report (UFSAR) in the "Accident Analysis" section on page 18 of Attachment 1 of the exemption request is actually a reference to Chapter M.11 of the UFSAR.

ENCLOSURE

The discussion in this section pertains to prior accident analyses performed for the OS197 and the OS197L TCs. Chapter 11 of the UFSAR pertains to quality assurance. Chapter M.11 of the UFSAR contains the accident analysis of the OS197.

This information is necessary to satisfy the requirements of 10 CFR 72.11.

#### **RAI-4**

OPPD should justify why the trailer shielding's impact on the structural response of the TC is not considered as creating the possibility for an accident of a different type than any previously evaluated in the UFSAR (10 CFR 72.48(c)(2)(v)).

OPPD's exemption request Attachment 2 page 95 section W.11.1.4 discusses the loss of neutron shield. This section evaluates, from a radiological perspective, the loss of the neutron shield and also postulates the loss of the trailer shielding. This evaluation does not include an evaluation of the structural impact the trailer shielding may have on the TC. For example, it is the staff's understanding that the 3 inch top shield is placed using a crane that is not single failure proof. OPPD does not evaluate the results dropping this shielding would have on the TC. In addition, TN does not evaluate the impact the additional transfer trailer shielding would have on the 80 inch accidental drop analysis discussed in Section W.11.1.3 of Attachment 2.

This information is necessary to satisfy the requirements of 10 CFR 72.48(c)(2)(v).