



Fort Calhoun Station  
P.O. Box 550  
Fort Calhoun, NE 68023

June 9, 2008  
LIC-08-0069

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Reference: Docket No. 50-285

**SUBJECT: Letter of Intent to Adopt NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition**

This letter is to confirm that Omaha Public Power District (OPPD) intends to adopt National Fire Protection Association (NFPA) Standard 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition, in accordance with 10 CFR 50.48(c) for the Fort Calhoun Station (FCS), Unit 1.

FCS is beginning the transition to the performance-based standard for fire protection in June, 2008. It is expected to take approximately thirty-six months to develop the license amendment request.

The FCS NFPA 805 transition consists of three phases:

Phase 1 - Preliminary Assessment of the Fire Protection Program

- Assessment to determine the scope of activities and resources needed to perform the transition.

Phase 2 - Reviews and Engineering Analysis

- Fire Probabilistic Risk Assessment
- Fundamental Fire Protection Program and Design Elements Assessment
- Radioactive Release Assessment
- Nuclear Safety Capability Assessment
- Non-Power Operational Modes Assessment
- Development of Change Evaluations and Transition Report
- Submittal of License Amendment Request

Phase 3 –Implementation

- Program Documentation
- Configuration Control
- Monitoring

OPPD intends to submit the license amendment by June 2011. The process will be considered complete upon receipt of the License Amendment authorizing the transition to NFPA 805.

OPPD requests enforcement discretion for 36 months as detailed in NRC Interim Enforcement Discretion Policy (71 FR 19905, April 18, 2006, and Regulatory Guide 1.205, May 2006) which established NRC policy regarding enforcement discretion for certain noncompliances related to fire protection programs and the transition to 10 CFR 50.48(c). As outlined in the Enforcement Policy, OPPD understands that enforcement discretion begins with this letter of intent. The Enforcement Policy also provides for extension of the discretion period if adequate justification is provided. OPPD will be evaluating the risk significance of all noncompliances and entering them into the corrective action program.

If you should have further questions, please contact me.

Sincerely,



D. J. Bannister  
Vice President

DJB/epm