



444 South 16th Street Mall
Omaha, NE 68102-2247

February 2, 2010
LIC-10-0006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555-0001

- References:
1. Docket No. 50-285
 2. Federal Register Notice, "Professional Reactor Operator Society; Receipt of Petition for Rulemaking" dated November 27, 2009 (74 FR 62257)

SUBJECT: Fort Calhoun Station Comments on Professional Reactor Operator Society; Receipt of Petition for Rulemaking (PRM-26-3)

In Reference 2, the Nuclear Regulatory Commission (NRC) requested public comment on a petition for rulemaking dated October 16, 2009, filed by the Professional Reactor Operator Society (petitioner). The petition was docketed by the NRC and assigned Docket No. PRM-26-3. The petitioner is requesting that the NRC amend the regulations that govern fitness for duty programs.

The Omaha Public Power District (OPPD) has reviewed Reference 2 and supports the petition. The petition provides a valid basis for the requested changes and is a useful enhancement to 10 CFR 26. However, OPPD requests that the proposed changes apply to single-unit sites as well. Although nothing in the proposed changes indicate otherwise, the petitioner states that its proposal applies to dual-unit sites with a shared control room.

Fort Calhoun Station is a single-unit site that also moves to 12 hour super-crews one week prior to a refueling outage. The benefits discussed in the petition, (e.g., acclimatization to the outage shift, crew familiarization, better preparation etc.) apply to single unit sites as well.

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If you have any questions or require additional information, please contact Mr. Bill R. Hansher at (402) 533-6894.

Sincerely,



T. R. Nellenbach
Division Manager - Nuclear Operations

TRN/mle

c: E. E. Collins, NRC Regional Administrator, Region IV
L. E. Wilkins, NRC Project Manager
J. C. Kirkland, NRC Senior Resident Inspector