



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

May 6, 2011

David J. Bannister, Vice President  
and Chief Nuclear Officer  
Omaha Public Power District  
Fort Calhoun Station FC-2-4  
P.O. Box 550  
Fort Calhoun, NE 68023-0550

SUBJECT: FORT CALHOUN STATION- NOTIFICATION OF NRC 95002 SUPPLEMENTAL INSPECTION FOR ONE DEGRADED CORNERSTONE OR THREE WHITE INPUTS IN A STRATEGIC PERFORMANCE AREA (NRC INSPECTION REPORT 05000285/2011011) AND REQUEST FOR INFORMATION

Dear Mr. Bannister:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region IV staff will conduct a supplemental inspection for one degraded cornerstone at your facility. The inspection will be comprised of six reactor inspectors from the NRC Region IV office. The inspection will be conducted in accordance with Inspection Procedure 95002, "Inspection for One Degraded Cornerstone or any Three White Inputs in a Strategic Performance Area."

The inspection will include two weeks of onsite inspection and one week of in-office preparation. The current inspection schedule is as follows:

Preparation Week:	June 6-11, 2011
Onsite weeks:	June 13-17, 2011
	June 30-July 1, 2011

Experience has shown that this inspection is resource intensive both for the NRC inspectors and your staff. In order to minimize the impact to your onsite resources and to ensure a productive inspection, we have enclosed a request for documents needed for this inspection. Please note that the documents are requested to be provided by May 31, 2011. Upon review of these documents, the inspectors will select additional documentation for review upon arrival. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

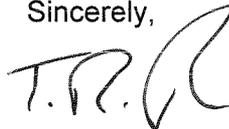
We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Ms. Donna Guinn of your licensing organization. If there are any questions about this inspection or the material requested, please

contact the lead inspector Gerond George at 817-276-6562 or by email [gerond.george@nrc.gov](mailto:gerond.george@nrc.gov).

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

A handwritten signature in black ink, appearing to read 'T.F. Farnholtz', with a stylized flourish at the end.

Thomas Farnholtz, Chief  
Engineering Branch 1  
Division of Reactor Safety

Dockets: 50-285  
Licenses: DPR-40

Enclosure:  
Supplemental Inspection for One Degraded Cornerstone or Three White Inputs in a Strategic Performance Area

cc w/ enclosure

Distribution via ListServe for Fort Calhoun Station

## SUPPLEMENTAL INSPECTION FOR ONE DEGRADED CORNERSTONE OR THREE WHITE INPUTS IN A STRATEGIC PERFORMANCE AREA

Inspection Dates: June 13 - July 1, 2011

Inspection Procedures: IP 95002, "Supplemental Inspection for One Degraded Cornerstone or Three White Inputs in a Strategic Performance Area"

Lead Inspectors: Gerond George, Senior Reactor Inspector, Region IV

The following information should be sent to the Region IV office in hard copy or electronic format (Certrec database preferred), in care of Gerond George, by May 31, 2011, to facilitate the in-office preparation week. Once reviewed, the inspectors will request from your staff additional documents needed during the onsite inspection weeks. We ask that the specific documentation requested be available and ready for review on the first day of inspection. Also, we request that you categorize the documents in your response with the numbered list below. Please provide requested documentation electronically unless hard copies are requested. If requested documents are large and only hard copy formats are available, please inform the inspector(s), and provide subject documentation during the first day of the onsite inspection. If you have any questions regarding this information request, please call the lead inspector as soon as possible.

1. The latest revision of Root Cause Analysis Report 2010-2387, "External Flooding Protection" NOTE: Please provide one hard copy and 6 CD-ROM's or DVD-ROM's to Gerond George at the Region IV office for the in-office preparation portion of the inspection. Additionally, please provide five hard copies for the onsite portion of the inspection.
2. Safety culture assessment associated with Root Cause Analysis Report 2010-2387
3. List of corrective actions for root cause and contributing causes for Root Cause Analysis Report 2010-2387. Include a timeline of all due dates for corrective actions.
4. Condition reports and corrective actions associated with Root Cause Analysis Report 2010-2387
5. Condition reports and corrective actions written for common cause aspects identified in the safety culture assessment
6. Design basis documentation as follows:
  - a. Updated Safety Analysis Report
  - b. Individual Plant Examination
  - c. Individual Plant Examination for External Events
  - d. Fort Calhoun Station Safety Evaluation Report
  - e. Fort Calhoun Station Technical Specifications

- f. Fort Calhoun Station Emergency Plan
  - g. If possible, list and description of NRC commitments
7. Corrective action program procedures for:
    - a. Initiating condition reports
    - b. Screening condition reports
    - c. Assigning condition report levels
    - d. Root cause generation
    - e. Root cause methodology
    - f. Effectiveness reviews
  8. Condition reports, evaluations, risk assessments, and corrective actions for the following licensee event reports and event notifications
    - a. Event Notification 46297-September 30, 2010-Unanalyzed Condition Due to Potential Flooding Via Condensate Drain Lines
    - b. Event Notification 46590-January 27, 2011-Unsealed Penetrations Discovered in the Intake Structure
    - c. Event Notification 46594-September 9, 2009-Unsealed Penetrations Discovered in the Intake Structure
    - d. Event Notification 46690-March 22, 2011-Potential Raw Water Pump Flooding
    - e. Event Notification 46716-March 31, 2011-Identified Unsealed Flood Barrier Penetrations
    - f. Event Notification 46747-April 13, 2011-Unsealed Barrier Flood Penetration
    - g. LER 05000285-2011-001-January 27, 2011-Inadequate Flooding Protection Due to Ineffective Oversight
    - h. LER 05000285-2011-003-February 4, 2011-Inadequate Flooding Protection Due to Ineffective Oversight
  9. Procedures for design change and procedure change processes
  10. All USAR changes, 50.59 evaluations, and design or procedure change packages associated with corrective actions for 2010-2387 and items listed in Item 8
  11. Design calculations for interim and final flood barriers
  12. Design calculations for equipment credited to mitigate effects of floods (portable pumps, sump pumps, etc.)
  13. Design basis flood event accident analysis
  14. Emergency flood procedures that govern:
    - a. Installation and construction of flood barriers
    - b. Location of flood barriers and flood protection equipment
    - c. Entry conditions into the Emergency Plan
    - d. Plant operation and shutdown during a flood event
  15. All Fort Calhoun Station emergency operating procedures
  16. All Fort Calhoun Station abnormal operating procedures

17. All Fort Calhoun Station severe accident management procedures
18. Condition reports written since 2009, which report conditions that affect the following:
  - a. Emergency Plan
  - b. External events (seismic, flood, industrial accidents, etc.)
  - c. Emergency Operating Procedures
  - d. Abnormal Operating Procedures
  - e. Severe accident guidelines
  - f. Regulatory Guide 1.33 procedures
  - g. Reporting requirements of 10 CFR 50.72 and 10 CFR 50.73
19. Quality assurance audits of:
  - a. Corrective action program
  - b. Design control and change process
  - c. Procedure change process
  - d. Root cause assessment process
  - e. NRC required reporting
20. All training lesson plans and list of individuals trained for:
  - a. Installation of interim and final flood barriers
  - b. Staging equipment for flood mitigation
  - c. Use of acts of nature emergency operating procedures
  - d. Design and procedure change processes
21. Flood barrier and penetration assessment completed by Stone & Webster and associated condition reports

Inspector Contact Information:

Gerond George  
Senior Reactor Inspector  
817-276-6562  
gerond.george@nrc.gov

Mailing Address:  
US NRC Region IV  
Attn: Gerond George  
612 E. Lamar Blvd., Suite 400  
Arlington, TX 76011-4125