



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

May 24, 2011
LIC-11-0056

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

- References:
1. Docket No. 50-285
 2. Letter from NRC (J. A. Clark) to OPPD (D. J. Bannister) "Fort Calhoun Station NRC Integrated Inspection Report 05000285/2009003 and Notice of Violation," dated August 3, 2009 (NRC-09-0057) (ML092150369)
 3. Letter from OPPD (J. A. Reinhart) to NRC (Document Control Desk), "NRC Inspection Report 05000285/2009003, Reply to a Notice of Violation (NOV) EA-09-174," dated September 2, 2009 (LIC-09-0066) (ML092470540)

SUBJECT: Schedule Revision Regarding Commitment to Upgrade the Raw Water Strainers to Safety-Related Status

The Omaha Public Power District (OPPD) is notifying the NRC of its need to revise the schedule for completion of a commitment made in Reference 3. In Reference 3, OPPD committed (AR 43640) to upgrade the filtering function of the raw water (RW) strainers to safety-related status during the 2011 Refueling Outage (RFO) by implementing Modification EC 41587. The commitment noted that this could include modification of the strainers and/or other associated components and that plant design documents such as the Updated Safety Analysis Report and Design Basis Documents would be revised as part of the modification process.

The commitment was made in response to an NRC Notice of Violation (NOV) (Reference 2), which resulted from the failure to classify RW strainer components as safety-related within a reasonable time after OPPD received a non-cited violation (2007007-003) in NRC Inspection Report 2007-007.

A schedule change is necessary because the level of the Missouri River is above the backwash piping for the RW strainers. The backwash piping must be replaced to upgrade the strainer backwash valves HCV-2805A and HCV-2805B with CQE valves and upgrade the backwash discharge piping to safety-related and Seismic Class I and thus is essential for fulfillment of the commitment. Attempting to replace the backwash

pipng in these conditions would place the station at risk of flooding the RW vault, which would have an adverse affect on plant safety.

The remaining portion of the EC 41587 modification will be completed during the 2011 outage. This includes the installation of safety-related strainer drive units, safety-related backwash control circuitry, and safety-related power cables (in 2010, EC 35741 upgraded the strainers such that they receive power from a safety-related source), and upgrading the strainers and their internals to safety-related. In addition, control room annunciation associated with the RW strainers will be upgraded and the changes will be incorporated into appropriate station documents.

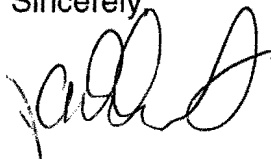
Based on recent historical trends and the U.S. Army Corps of Engineers forecast (<http://www.nwd-mr.usace.army.mil/rcc/reports/cyfcst.html>), it is unlikely that river levels will support installation of the new RW strainer backwash piping and new backwash valves (one per strainer) in 2011. Therefore, OPPD is revising the completion date for installing the new RW strainer backwash piping and new backwash valves to the end of the 2012 RFO, which begins in September 2012. Current and anticipated river levels make delaying the installation of these components preferable to replacing the components with its potential to flood the RW vault.

The delay is acceptable for several reasons. The design and material specifications of the existing piping and valves are the same as the new safety-related components. The existing piping is stainless steel, approximately 10 years old and thus is relatively new. There has been no documented leakage into the RW vault from failure of the backwash piping or valves since the piping was replaced. The internals of valve HCV-2805A and HCV-2805B were replaced in April 2010 and May 2009 respectively. Quarterly testing will verify that the piping and valves remain capable of performing their design basis function.

No new regulatory commitments are made in this submittal.

If you should have any questions, please contact Bill Hansher at (402) 533-6894.

Sincerely,



Jeffrey A. Reinhart
Site Vice President

JAR/RLC/mle

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