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Omaha, NE 68102-2247

June 10, 2011
LIC-11-0058

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

References: 1. Docket No. 50-285
2. NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011 (NRC-11-0048) (ML111250360)

SUBJECT: 30-Day Response to NRC Bulletin 2011-01, Mitigating Strategies

Pursuant to 10 CFR 50.54(f), attached is the Omaha Public Power District (OPPD) 30-day response to NRC Bulletin 2011-01, "Mitigating Strategies," (Reference 2). The bulletin was issued to confirm continued compliance with 10 CFR 50.54(hh)(2) and request information regarding the mitigation strategies program.

NRC Bulletin 2011-01 identified the following three objectives:

1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of 10 CFR 50.54(hh)(2),
2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

NRC Bulletin 2011-01 requested that within 30 days, licensees submit a response to questions to confirm continued compliance with 10 CFR 50.54(hh)(2) and requested within 60 days that licensees provide information regarding mitigation strategies programs required by 10 CFR 50.54(hh)(2). OPPD's 30-day response is attached.

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There are no regulatory commitments in this letter. If you should have questions, please contact Mr. Bill Hansher at (402) 533-6894

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 10, 2011.



Jeffrey A. Reinhart
Site Vice President

JAR/RMC/mle

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

Attachment: OPPD 30-Day Response to Bulletin 2011-01

OPPD 30-Day Response to Bulletin 2011-01

The NRC has requested the following information:

In order to confirm continued compliance with 10 CFR 50.54(hh)(2), within 30 days of the date of this bulletin, the NRC requests that licensees provide the following information on their mitigating strategies programs.

NRC Request No. 1

Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?

OPPD Response

The Omaha Public Power District (OPPD) confirms that equipment necessary to execute the mitigating strategies as described in our submittals to the NRC (References 1 through 5) as modified by Reference 7 and as reviewed and approved by the NRC (Reference 6) is available and capable of performing its intended function.

The equipment was recently inventoried, inspected, and tested. Letters of Agreement and Memorandums of Understanding with offsite organizations were also re-validated and/or re-issued, as appropriate.

NRC Request No. 2

Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

OPPD Response

OPPD confirms that the guidance and mitigating strategies as described in our submittals to the NRC (References 1 through 5) as modified by Reference 7 and as reviewed and approved by the NRC (Reference 6) are available and capable of being executed. The current staffing and its skill level as well as the configuration of Fort Calhoun Station was considered in reaching this determination.

Changes to commitments (e.g., as described in Reference 7) have been evaluated and are documented in accordance with the Nuclear Energy Institute (NEI) commitment management guideline (Reference 8).

Each procedure implementing the required mitigation strategy was walked down to ensure that the procedures are available and capable of being implemented. Enhancements were identified and entered into the Corrective Action Program. Operations and support staff are trained and periodically retrained as necessary on the procedures and strategies.

References

1. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Response to NRC Guidance Regarding Mitigation Strategies," dated May 31, 2005 (LIC-05-0056) (ML051570413)
2. Letter from OPPD (M. A. Tesar) to NRC (Document Control Desk), "Response to Request for Additional Information Regarding the February 2002, Order Section B.5.b, for Fort Calhoun Station," dated October 14, 2005 (LIC-05-0124) (ML052910485)
3. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Response to Report of Inspection of Nuclear Reactor Safeguards Interim Compensatory Measure - Section B.5.b, Temporary Instruction 2515/164, NRC Inspection Report 05000285/2005013 - Phase 1 Items," dated March 7, 2006 (LIC-06-0024)
4. Letter from OPPD (Jeffrey A. Reinhart) to NRC (Document Control Desk), "Fort Calhoun Station, Unit No. 1, Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies," dated February 16, 2007 (LIC-07-0007) (ML070520403)
5. Letter from OPPD (H. J. Faulhaber) to NRC (Document Control Desk), "Revised Fort Calhoun Station, Unit No. 1, Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies," dated May 4, 2007 (LIC-07-0030) (ML071240496)
6. Letter from NRC (A. B. Wang) to OPPD (R. T. Ridenoure), "Fort Calhoun Station, Unit No. 1 - Conforming License Amendment to Incorporate the Mitigation Strategies Required by Section B.5.b. of Commission Order EA-02-026 (TAC No. MD4534)," dated July 26, 2007 (NRC-07-0073) (ML072040097)
7. Letter from OPPD (R. P. Clemens) to NRC (Document Control Desk), "Clarification of B.5.b Commitments for Fort Calhoun Station, Unit No.1," dated April 3, 2009 (LIC-09-0021) (ML091040756)
8. NEI 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999