



444 South 16<sup>th</sup> Street Mall  
Omaha, NE 68102-2247

LIC-11-0089  
August 12, 2011

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

- References:
1. Docket No. 50-285
  2. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Letter of Intent to Adopt NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition," dated June 9, 2008 (LIC-08-0069) (ML081620232)
  3. Letter from OPPD (H. J. Faulhaber) to NRC (Document Control Desk), "Notification of Extension of Commitment to Submit License Amendment Request (LAR) to Adopt NFPA 805 and Status Change of Enforcement Discretion at Fort Calhoun Station (FCS), Unit No. 1," dated June 9, 2011 (LIC-11-0054)
  4. Letter from NRC (J. G. Giitter) to OPPD (D. J. Bannister), "Fort Calhoun Station, Unit No.1 - Response to Request for Extending Enforcement Discretion Deadline to Adopt National Fire Protection Association Standard 805 (TAC No. ME6643)," dated July 22, 2011 (NRC-11-0079) (ML111960435)

**SUBJECT: Omaha Public Power District Confirmation Letter of Intent to Submit National Fire Protection Association (NFPA) 805 Transition License Amendment Request**

The Omaha Public Power District (OPPD) provides this letter confirming OPPD's intention to submit the license amendment request (LAR) for transitioning the current Fort Calhoun Station (FCS) fire protection program from 10 CFR 50, Appendix R to National Fire Protection Association (NFPA) 805, *Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition*, on or before September 30, 2011.

According to Reference 2, it was expected to take approximately 36 months to develop the NFPA 805 transition LAR; thus, OPPD requested enforcement discretion for 36 months. This enforcement discretion expired on June 9, 2011, and in Reference 3, OPPD requested that it be extended in accordance with the NRC's Enforcement Policy.

OPPD's request for the extension of enforcement discretion was based on the extension of the commitment to transition to NFPA 805 until the alternative fire probabilistic risk assessment (PRA) methods are approved by the Industry New Methods Peer Review Panel and the impact, if any, can be determined and incorporated into the FCS fire PRA model. In Reference 3, OPPD committed to submit the LAR for transitioning to NFPA 805 no later than 90 days after the industry review panel completed its reviews of the alternative fire PRA methods. In Reference 4, the NRC stated that "the staff recognizes FCS's need for additional time to integrate the Task Force reviewed methods or conduct a sensitivity analysis of any unreviewed methods." The NRC also informed OPPD via Reference 4 that "OPPD has until September 30, 2011 to submit its NFPA 805 LAR to continue to have uninterrupted enforcement discretion."

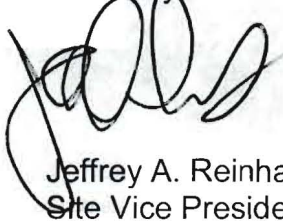
A teleconference was held between NRC and OPPD senior management on August 5, 2011. In response to NRC questions related to submittal of the FCS NFPA 805 LAR, OPPD provides the following, to ensure clarity of docketed correspondence:

- The NFPA 805 transition LAR will be submitted on or before September 30, 2011.
- In accordance with Reference 4, a sensitivity analysis was performed on the use of alternate PRA methods that are in review by the Industry New Methods Peer Review Panel.
- Initial results of the sensitivity analysis indicate that the FCS fire PRA meets NFPA 805 acceptance criteria.
- OPPD used the approved heat release rates for transient combustibles per the guidance in NUREG/CR-6850.

Attachment 1 provides the one regulatory commitment being made in this letter: OPPD will submit the LAR for transitioning FCS to NFPA 805 on or before September 30, 2011.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Bill R. Hansher at 402-533-6894.

Sincerely,



Jeffrey A. Reinhart  
Site Vice President

JAR/JLM/dll

Attachment

## REGULATORY COMMITMENT

Commitment(s) / Scheduled Completion Date
OPPD will submit the LAR for transitioning to NFPA 805 on or before September 30, 2011. [AR 48249]