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March 30, 2012
LIC-12-0034

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

References: 1. Docket No. 50-285.
2. Letter from NRC (E. J. Leeds & M. R. Johnson) to OPPD (D. J. Bannister), "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (EA-12-049), (NRC-12-0020).

SUBJECT: Omaha Public Power District's Answer to March 12, 2012 Commission Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Effective Immediately) ("Order") to, *inter alia*, Omaha Public Power District (OPPDP). The Order states that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC had decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically with respect to this Order, the NRC is requiring additional defense-in-depth measures at licensed nuclear power reactors to address uncertainties associated with protection from beyond-design-basis external events. Licensees are specifically directed by the Order to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six-month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this order in August

2012. Finally, the order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, OPPD hereby submits its answer to the Order. OPPD consents to the Order and does not request a hearing. Based on information currently available, OPPD has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, OPPD has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever is earlier. OPPD will provide further responses as required by Section IV.C in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of OPPD to comply with the specific compliance deadline dates based on the probable availability of that guidance, OPPD's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

If you have any questions regarding this confirmation of receipt, please contact Mr. Bill Hansher at (402) 533-6894. No commitments to the NRC are made in this letter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 30, 2012.

Sincerely,



D. J. Bannister
Site Vice President and CNO

DJB/JKG/mle

- c: E. J. Leeds, Director of Office of Nuclear Regulation
E. E. Collins, Jr., NRC Regional Administrator, Region IV
L. E. Wilkins, NRC Project Manager
J. C. Kirkland, NRC Senior Resident Inspector