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LIC-13-0172  
November 27, 2013

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

- References:
1. Docket No. 50-285
  2. Letter from NRC (E. J. Leeds & M. R. Johnson) to OPPD (D. J. Bannister), "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ML12053A340) (NRC-12-0021)
  3. Electric Power Research Institute (EPRI) Report "Seismic Walkdown Guidance, For Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," EPRI, Palo Alto, CA: 2012. 1025286 (ML12188A031)
  4. Letter to NRC (Document Control Desk) from OPPD (L. P. Cortopassi), "OPPD 180-day response to NRC request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated November 27, 2012 (ML12340A257) (LIC-12-0169)
  5. Letter to NRC (Document Control Desk) from OPPD (L. P. Cortopassi), "Update to EA12-021, "Seismic Walkdown Submittal Report," dated June 28, 2013 (ML13193A236) (LIC-13-0070)
  6. Letter from NRC (R. H. Beall) "Request for Additional Information Associated with Near-Term Task Force Recommendation 2.3, Seismic Walkdowns," dated November 1, 2013, (ML13304B418) (NRC-13-0141)

**Subject: Response to Request for Additional Information Associated with Near-Term Task Force Recommendation 2.3, Seismic Walkdowns**

On March 12, 2012, the Nuclear Regulatory Commission (NRC) staff issued a letter requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (i.e., Reference 2). The letter requested licensees to conduct seismic hazard walkdowns to verify current plant configuration with the Current Licensing Basis (CLB). The NRC endorsed an Electric Power Research Institute (EPRI) guidance document that resulted from this effort (i.e., Reference 3); because the NRC staff determined that, the use of the guidance, coupled with appropriate training, would meet the objectives and requests of Reference 2.

The Omaha Public Power District (OPPD) submitted the walkdown report(s) for Fort Calhoun Station by letters dated November 27, 2012 and June 28, 2013 (i.e., References 4 and 5).

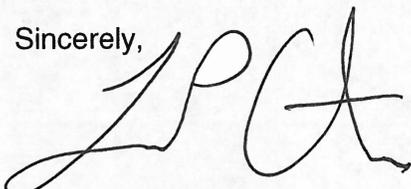
Following the staff's initial review of the walkdown reports, regulatory site audits were conducted at a sampling of plants. Reference 6 is a request for additional information submitted to many licensees including OPPD. The enclosed supplemental report provides additional information not requested by Reference 2 intended to assist the NRC staff in completing their review of the Seismic Hazard Walkdowns conducted at Fort Calhoun Station.

This letter contains no new regulatory commitments.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2013.

Sincerely,

A handwritten signature in black ink, appearing to read 'LPC', with a stylized flourish at the end.

Louis P. Cortopassi  
Site Vice President and CNO

Enclosure: Response to Request for Additional Information, Seismic Walkdowns

c: E. J. Leeds, NRC Director of the Office of Nuclear Reactor Regulation  
M. L. Dapas, NRC Regional Administrator, Region IV  
J. M. Sebrosky, NRC Senior Project Manager  
L. E. Wilkins, NRC Project Manager  
J. C. Kirkland, NRC Senior Resident Inspector

## **Response to Request for Additional Information Seismic Walkdowns**

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a letter requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter called the 50.54(f) letter). The 50.54(f) letter requested that licensees conduct seismic hazard walkdowns to verify the plant configuration with the current licensing basis (CLB). The licensees stated by letter that the seismic walkdowns would be performed in accordance with Electric Power Research Institute EPRI-1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic" (walkdown guidance). Following the NRC staff's initial review of the walkdown reports, regulatory site audits were conducted at a sampling of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow the staff to complete its assessments.

**NRC Question 1: Conduct of the walkdowns, determination of potentially adverse seismic conditions (PASCs), dispositioning of issues, and reporting**

As a result of the audits and walkdown report reviews, the NRC staff noted that licensees' interpretations of the seismic walkdown guidance varied, which resulted in meaningful differences in the process used to disposition identified issues and in the documentation that was provided to the NRC staff. In particular, the application of engineering judgment in determining what constituted a potentially adverse seismic condition (PASC), the threshold for conducting licensing basis evaluations (LBEs), and determining what information was to be reported to the NRC staff varied.

The NRC staff intended that conditions initially marked No (N) or Unknown (U) in the field by the seismic walkdown engineers (SWEs) for which an analysis or calculation was performed would be considered as PASCs and that an analysis or calculation constituted a LBE. The walkdown guidance allows for analysis as part of engineering judgment; however, the intent was to allow for only simple analyses that could be readily performed in support of engineering judgment. Further, the walkdown activities were intended to allow for transparency in the licensee's process to demonstrate that PASCs were appropriately identified, that they were addressed in an appropriate manner and the basis documented such that the current condition of the plant was clearly consistent with the CLB with regards to seismic capability.

During the audits, the NRC staff identified examples of field observations that were deemed not to be PASCs. However, the basis for the determination was not clearly recorded. In some cases, the field checklists were amplified by noting that the basis was engineering judgment. During site audit discussions, the staff was able to trace the basis for the engineering judgments and found that many cases they were appropriate. It is expected that these situations would not be included in the walkdown report.

There were other situations that a PASC and LBE were not reported; however the NRC staff found during the audit that a calculation, analysis (more than just simple) or evaluation was conducted but informally. An example is a confirmatory calculation performed to demonstrate that six anchor bolts out of eight was not a seismically adverse condition. Another example would be an analysis to demonstrate that an existing, slightly short weld was as seismically sound as the prescribed weld length in the plant design documentation. The staff expected these types of conditions and evaluations to be captured in the licensee's normal plant processes (e.g., condition report or

corrective action program (CAP)), and also reported in the walkdown report, since they were potentially adverse seismic conditions that required more than applying judgment or simple analysis to address.

The NRC staff also found that the process that was used to deal with a field observation that was deemed to be a PASC was also not completely described or captured in the report. In many cases, the licensee reported that a LBE was not performed. However, during the audits it was clear that an LBE (or an equivalent determination method) was performed and used in determining whether a PASC should be entered into the CAP. The staff expects that these conditions would be reported in the walkdown report.

On the whole, through the audits, the NRC staff found that it was able to conclude that the intent of the guidance was met when the licensee's overall process was completely explained, the information was updated to reflect the actual process and resulted were updated. The self-assessments conducted by the licensees of the audited plants also identified the lapse in the description of the process used by the licensee to identify a PASC and disposition it.

Therefore, in order to clarify the process that was followed, provide a description of the overall process used by the licensee (and its contractors) to evaluate observations identified in the field by the SWEs. The process should include how a field observation was determined to be a PASC or not and how the bases for determinations were recorded. Once a determination was made that an observation was a PASC, describe the process for creating a condition report (or other tracking mechanism), performing the LBE (or other determination method), and the resultant action, such as entering it into the CAP, or documenting the result and basis.

#### **OPPD Response:**

Fort Calhoun Station utilized an engineering contractor in conjunction with station personnel to perform the seismic walkdowns. These SWEs, comprised of a senior engineer and a junior engineer were accompanied by a member of the operations department to facilitate in locating components and ensuring the walkdowns did not interrupt or conflict with the scheduled daily plant operations. Throughout the walkdown, several observations were made by SWEs that were noted on the field copies of the walkdown and area walk-by checklists.

Any potentially adverse seismic conditions or other adverse seismic conditions were documented with a No (N) on the checklist for the appropriate question. Any item that was viewed to pose a PASC for the station was determined using the questions listed on the walkdown checklist in accordance with the SWE's seismic experience and training (NTTF 2.3 Training or Seismic Qualification Utility Group (SQUG)). A PASC was listed as a No (N) on the walkdown checklist. If any of the items marked No (N) on the checklist were deemed to be an immediate concern for the operability of the station by the SWE's or the accompanying member of operations, the walkdowns would be stopped and a condition report written for each issue with the item for immediate action. None of the PASC's discovered were considered to be immediate operability concerns by the SWE's or the accompanying member of operations department. In addition, conditions related to general housekeeping that were deemed not detrimental to plant operations, were identified on the PASC table and a condition report was written for resolution in CAP.

The SWE's viewed various items (such as light oxidation on bolts, surface shrinkage cracks in the concrete) and deemed them not a PASC. For each of these conditions the SWE's provided a thorough write-up on the checklist in the pertinent section explaining the specific condition of the issue and the justification for why the issue was not considered to be a PASC. If there was significant deliberation on an issue or a

signification disagreement between the SWE's, the team conservatively erred on the side of caution and listed the item as a No (N) on the checklist for the appropriate question.

When a component on a walkdown checklist required an anchorage configuration verification (question number 5 on the seismic walkdown checklist), and the correct licensing documentation relating to the anchorage of the component in question was not available in the field, the checklist was marked with a No (N) and documented as a PASC. The SWEs then took extensive photographs; recorded anchorage dimensions and sizes, and took down a detailed sketch of the configuration for later verification through the License Basis Evaluation (LBE) process.

After the walkdowns were completed, the items on the walkdown and area walk-by checklists marked No (N) were documented on a PASC table. A post-job brief was held each day between the SWE's and station personnel. During this post-job brief, observations by the SWEs were discussed. This information included but not limited to items listed as a No (N) on the walkdown checklist or the area walk-by checklist, seismic housekeeping, and previous walkdown experience. For the PASCs pertaining to anchorage configuration verification, current licensing documentation was obtained and compared to the walkdown field sketches and photographs to determine if the anchorage configuration verification matched its licensing basis. A LBE was then performed and noted in the PASC table.

All items, excluding the anchorage configuration documentation discussed above, were entered into CAP for each of their respective issues (if not done so already) at the conclusion of each days post-job brief. CAP items were generated for any PASC that could not be dispositioned by the SWEs based on their training, engineering judgment and existing station documentation available to them. The CAP process was utilized to track resolution of all identified PASC. If calculations or drawing updates were required, the resolution was tracked and captured via the corrective action process.

As noted above, CAP items were generated for any PASC that could not be dispositioned by the SWEs with existing documentation available to them. The station personnel and the SWE's both agreed to take a cautious approach of a seismic walkdown and entered items into CAP for all issues that both SWE's could not disposition with a simple documented resolution and a high degree of confidence. These potentially adverse conditions were logged onto a PASC table which identified the CAP reference number (if applicable), identified condition and resolution.

**NRC Question 1 (continued):**

**Also, in order to confirm that the reported information supports concluding that the plant meets the CLB, please follow one of the following three acceptable alternatives:**

- (a) Provide a supplement to the table or text from the original walkdown report, if needed, to include similar conditions as the above examples and situations and for conditions for which a calculation, analysis (if more than a simple analysis), or evaluation was used for a determination. The supplement should include a short description of each condition, how it was dispositioned and the basis for the disposition, as follows: 1) for each condition that was entered into the CAP, provide the CAP reference number, initiation date, and (if known) the planned completion date, or 2) for all other conditions, provide the result of the LBE (or other determination method), the basis for the result, and how (or where) the result was captured in the plant's documentation or existing plant process.**

### **OPPD Response**

As described in References 4 and 5, Attachment 11.4 is the PASC table (which satisfies item (a) 1) of NRC question. This table provides a description of each PASC, the CAP (or CR) reference number associated with resolving the PASC (if entered into the CAP), identified condition and resolution (if not entered into the CAP). Each of these CAP entries initiation and completion dates are as follows in the CAP table provided which was updated in Reference 5, and an update to the CR status is provided in the Table attached herein.

As described in References 4 and 5, Attachment 11.5 includes every LBE performed for all the PASCs not entered into the CAP. These LBEs demonstrate how each individual PASC was dispositioned, the methodology used to disposition the PASCs, the result of each LBE, and the basis for each result.

All observations judged by the SWEs to be a potentially adverse seismic condition have been addressed and are included in References 4 and 5, which have been submitted to the NRC.

Seismic Walkdown Condition Report Tracking List

CR	Issue Description	Action	Initiated Date	Status	Closed Date
CR 2012-10195	Tool stored in the Missile Shield room near instrument air supply filter/regulator assembly.	Removed and disposed of item.	8/14/2012	Closed	8/21/2012
CR 2012-10198	Missing pipe support clamp for a support.	A new pipe clamp has been reinstalled.	8/14/2012	Closed	4/30/2013
CR 2012-10367	Potential missing clips for protective screen on jacket water radiator and procedure does not specify minimum number of clips.	Grating does not have any safety-related purpose and is not a 2 over 1 seismic concern. There are no minimum requirements for the number of fasteners used to secure the screen.	8/15/2012	Closed	2/19/2013
CR 2012-10368	Two tool boxes that were located near an instrument air line are on wheels that do not have locking mechanisms on the wheels. The concern is that the tool boxes could inadvertently move and rupture the air line.	Per PED-GEI-34, room 65 is a permitted storage area. As noted in the CR, C-Clamps were installed on the wheels of the toolbox and a 6 inch tall concrete curb located at the intersection of the floor and wall would have prevented the cabinet from striking the instrument air line.	8/15/2012	Closed	5/30/2013
CR 2012-10369	Insulation located on the exhaust line of DG-2, whether or not the extra weight has been evaluated from a seismic standpoint.	The DNC found that the seismic loading for the insulation has been evaluated in calculation FC04292.	8/15/2012	Closed	1/4/2013
CR 2012-10423	Lighting does not have a bulb covering and light bulbs could cause electrical issues when collapsing onto cabinets during seismic events.	There will not be any effect on electrical equipment inside of cabinets or damage to the exterior of cabinets.	8/16/2012	Closed	1/30/2013
CR 2012-10425	Large metal carts on wheels are not restrained against lateral motion and could possibly contact and damage nearby cabinets.	The storage and placement of transient equipment and materials is controlled per procedures.	8/16/2012	Ready to Close	Pending
CR 2012-10427	3/8" Gap between non-adjacent cabinet that could lead to physical interaction during an out-of-phase movement induced by a seismic event.	Reviewed A-46 program for the cabinets in the switchgear room. The cabinets are acceptable.	8/16/2012	Closed	1/30/2013
CR 2012-10553	Four anchor bolts for RAW WATER STRAINER have less than full thread engagement with their respective nut.	Only the one strainer had the issue where the bolts were not fully engaged. The crafts were contacted and will have to develop work instructions for replacing the strainers and add a note to ensure that the washers are installed on the anchors so that the thickness allows sufficient thread engagement.	8/17/2012	Maintain Action	Plan to close by 1/8/2014
CR 2012-10628	Portable work light hanging unsecured above the sump. Light moved. No other actions are required.		8/17/2012	Closed	8/31/2012
CR 2012-10629	Light bulb with no safety cover hanging above the RW pump pressure indicator.	WR 183237 written.	8/17/2012	Closed	9/17/2012

## Seismic Walkdown Condition Report Tracking List

CR	Issue Description	Action	Initiated Date	Status	Closed Date
CR 2012-10630	Loose Chicago fittings in the vicinity of the Diesel fire protection pump.	Properly stored and are no longer just laying loose.	8/17/2012	Closed	8/28/2012
CR 2012-10631	Bent light fixture resting against an instrument air line to the RW pump isolation valve.	WO 456244 corrected the identified condition.	8/17/2012	Closed	4/3/2013
CR 2012-10672	Rope with a metal attachment hanging right next to manifold valves and could potentially free-swing into those components.	Rope, with metal attached, was removed.	8/18/2012	Closed	9/6/2012
CR 2012-10676	Mounting plate for structural steel in the southeast corner of Room 72 there are slotted holes for the anchor bolts parallel to the dead load. This could possibly put a bending moment on the bolts.	Engineering review determined that the load profile does not result in a moment on the base plate and does not induce tension in the anchor bolts.	8/18/2012	Closed	4/17/2013
CR 2012-10684	The fuel position status board and the water cooler are unrestrained. During a seismic event those items could potentially fall (status board) or roll (water cooler) into control panels and other sensitive components.	The bottle can roll around because there are no targets that are low. FIN has cut the status board frame, removed it from the control room, and placed it into the 3rd floor service fan housing room until it can be modified to fit under the door of the control room to bring in during core reload.	8/18/2012	Closed	6/16/2013
CR 2012-10915	0.5 inch gap approximately between a horizontal lateral angle 2 inch by 2 inch (steel) and the block wall (the mid height lateral), and it was noted that it had a sag in the center of the horizontal length of the lateral.	Review of EA96-041 and FC05056 show the predicted seismic accelerations for FCS would not overcome the coefficient of friction between the blocks.	8/20/2012	Closed	2/8/2013
CR 2012-10916	A cart with wheels in the contaminated area that contained tools and miscellaneous items could potentially move during a seismic event if not restrained or wheels locked in place.	The cart located is properly stored outside the safe shutdown area. All procedures were adequately followed.	8/20/2012	Closed	5/30/2013
CR 2012-10917	Multiple chains wrapped around a restraint. The chains are from the overhead crane and trolley. The chains are not secured or tied off, and during a seismic event could potentially unwrap.	When not in use, secure suspended chains and buckets to nearby structural elements by an appropriate attachment device.	8/20/2012	Closed	7/24/2013
CR 2012-10919	Pitting in the floor concrete near some anchors.	Appears the spalling occurred during installation of the expansion anchors. WR-1844770 to install new anchors written. This WR created WO 457861-01 to rework tubing supports.	8/20/2012	Closed	9/3/2013

Seismic Walkdown Condition Report Tracking List

CR	Issue Description	Action	Initiated Date	Status	Closed Date
CR 2012-11039	Concrete was missing on four corners of each concrete pedestal. Concrete was removed or spalled so that the original anchor bolts provide no mechanical anchorage. One side of the heat exchanger is on wheeled supports with no mechanical anchorage.	Calculation FC07235 analyzes this anchorage. The concrete was chipped out to install bolts from below. This is the plant design basis configuration.	8/21/2012	Closed	3/8/2013
CR 2012-11041	Two hoist chains were suspended from two separate trolleys, and the chains were hanging down and the ends of the chains were placed in buckets unsecured near a compressed air line.	When not in use, secure suspended chains and buckets to nearby structural elements by an appropriate attachment device.	8/21/2012	Ready to Close	Pending
CR 2012-11277	One of four bolts was missing from the baseplate for a vertical pipe support suspended from ceiling on the Low Pressure Safety Injection Pump discharge line ~5 feet downstream of the discharge valve.	MECHANICAL SNUBBER is operable. Reference IR-950050 Reel 4782. Per Calculation FC02843, the As-Built design (4 holes, 3 anchor bolts) is capable of performing its design function and snubber drawing 7138 reflects the current 3 anchor bolt installation.  Identify the design basis and determine if 3 anchor bolts is capable of performing its design function documented in Calculation FC02843.	8/23/2012	Maintain Action	Plan to close by 3/21/2014
CR 2012-11879	Anchor bolts through the base plate for the posts appear to be corroded and possibly need to be replaced.	WR194758 was initiated to allow the anchor bolts to be replaced and baseplate to be cleaned by following the normal work management process.	8/27/2012	Ready to Close	Pending
CR 2012-11880	No tag for scaffolding that was erected around tank. Scaffolding could cause seismic interaction issues with adjacent equipment.	Based on referenced procedures there is already a method in place to show that a Temporary Shield structure has been properly evaluated for seismic concerns and what to do if shielding is found with out a tag. No further action is required.	8/27/2012	Maintain Action	Plan to close by 1/24/2014
CR 2012-11973	A hanging light fixture is suspended from a flexible rod in close proximity to an indicator.	The maximum displacement of the light fixture is less than the available distance between hanging light fixture and the indicator. The 3/8 inch steel rod vertical light fixture is also has a horizontal double unistrut rigidly support. This horizontal double unistrut support keeps light fixture in place. There is no seismic interaction concern for the light fixture installation.	8/27/2012	Closed	1/3/2013

Seismic Walkdown Condition Report Tracking List

CR	Issue Description	Action	Initiated Date	Status	Closed Date
CR 2012-12399	Scaffolding is constructed very close to existing piping and is only anchored at one location. This could lead to potentially large deflections away from the support point during a seismic event causing interaction issues between the scaffolding and the nearby piping.	This issue could not be investigated. The scaffold has been removed. The only activity that would be useful is to reinforce to the scaffold inspectors (DEN civil engineers) to be diligent in reviewing scaffolds and enforcing the criteria specified in PED-CSS-12.	8/30/2012	Closed	1/4/2013
CR 2012-12400	Oily looking substance found accumulated that could potentially be a fire-hazard.	WR186128 for cleaning oily substance found on pump base is scheduled for cleaning while plant is online.	8/30/2012	Closed	7/18/2013
CR 2012-12401	Tools laying out unsecured and a ladder located outside of the red tape (possibly deemed non storage area). The tools were located on the table in the center of the room.	All items have been stowed away properly. It was not possible to identify the responsible individuals so no coaching was performed.	8/30/2012	Closed	5/22/2013
CR 2012-12402	Potential spatial interaction observed between a pipe and Junction Box where a gap less than 2" is observed between the two items.	Spatial interaction in the horizontal direction was determined to be acceptable, and interaction with the CCW piping is not a concern.	8/30/2012	Closed	4/9/2013
CR 2012-12403	Electrical cords plugged in and loosely hanging on a pipe support that could be a possible fire hazard.	The cords have been strapped together and are not hanging loosely on the piping.	8/30/2012	Closed	1/2/2013
CR 2012-12404	There is a gap less than 2" between a pipe and an unrelated vertical pipe support, this could be a spatial interaction issue during a seismic event.	An analysis was prepared to check the maximum horizontal (z-direction) deflection on the frame support. This shows that the adequate gap will be maintain during a design basis seismic event.	8/30/2012	Closed	2/5/2013
CR 2012-12405	Bent hanger rod supporting line, this may or may not be detrimental to the intended design function of the support.	Based on the allowable load and imposed load on the hanger rod it is concluded that the existing configuration is not degraded. The hanger rod will perform its intended design function in the seismic event.	8/30/2012	Closed	2/5/2013
CR 2013-00522	Inside the cabinet was a wood shim. Maintenance on the breakers was being performed. I do not think that flammable material should be stored inside the safety related breakers switchgear and this should be evaluated by the fire protection program engineer.	Wood shim was removed. Storing the wood shim in the breaker cubicle is a violation of SO-G-91. The additional combustible load is negligible and bounded by the load assumed in the combustible load calculation, FC05814. No additional actions required.	1/8/2013	Closed	2/5/2013

## Seismic Walkdown Condition Report Tracking List

CR	Issue Description	Action	Initiated Date	Status	Closed Date
CR 2013-07194	Door hinge on one cubical was missing 2 bolts on a door hinge. There are spaces for 5 total. Three bolts are installed. Each has a capacity of 500 pounds tension. This is sufficient to hold the door in place. The two bolts missing were due to final fit up and the holes for the bolts did not line up. The bolts do not need to be installed and will be noted in the 1B4A seismic qualification report (SEWS).	Did prompt evaluation which resulted in door hinge being acceptable.	3/30/2013	Closed	8/7/2013
CR 2013-08401	An interior bolt was missing inside the cabinet on the plate that separates the cubicles. This was identified as a non structural bolt and does not reduce the capacity of the cabinet and does not affect the seismic rating of the cabinet.	WR 195204 was written to replace bolt. Created task to replace missing bolt. Assigned task to EM.	4/16/2013	Closed	8/23/2013
An abbreviated list was provided as part of LIC-13-0070 Enclosure 2					

**NRC Question 1 (continued):**

- (b) Following the plant's standard procedures, confirm that a new CAP entry has been made to verify if appropriate actions were taken when reporting and dispositioning identified PASCs (including conditions for which a calculation, analysis (if more than a simple analysis), or evaluation was used for a determination. The eventual CAP closeout, including the process followed and actions taken, should be in sufficient detail to enable NRC resident inspectors to follow up.

**OPPD Response:**

No new CR entries have been entered to report or disposition PASCs since Reference 5. The table attached is a status update of the CRs previously documented in References 4 and 5.

- (c) If no new conditions are identified for addition to the supplement or the CAP entry mentioned above is deemed not necessary, provide a statement of confirmation that all potentially seismic adverse conditions (including conditions for which a calculation, analysis (if more than a simple analysis), or evaluation was used for a determination) identified during the walkdowns and walk-bys were addressed and included in the report to the NRC.

**OPPD Response:**

OPPD confirms that all PASCs have been previously identified in the Corrective Action Program as a result of the NTTF 2.3 Seismic Walkdown and reported to the NRC in References 4 and 5.

**NRC Question 2: Conduct of the Peer Review Process**

As a result of the walkdown report reviews, the NRC staff noted that some descriptions of the peer reviewers and the peer review process that was followed were varied and in some cases unclear. In some cases, the staff could not confirm details of the process, such as if the entire process was reviewed by the peer review team, who were the peer reviewers, what was the role of each peer reviewer, and how the reviews affected the work, if at all, described in the walkdown guidance.

Therefore, in order to clarify the peer review process that was actually used, please confirm whether the following information on the peer review process was provided in the original submittal and if not, provide the following.

- (a) Confirmation that the activities described in the walkdown guidance on page 6-1 were assessed as part of the peer review process.
- (b) A complete summary of the peer review process and activities. Details should include confirmation that any individual involved in performing any given walkdown activity was not a peer reviewer for that same activity. If there were cases in which peer reviewers reviewed their own work, please justify how this is in accordance with the objectives of the peer review efforts.

Also, if there are differences from the original submittal, provide a description of the above information. If there are differences in the review areas or the manner in which the peer reviews were conducted, describe the actual process that was used.

**OPPD Response:**

The peer reviews completed for the Fort Calhoun Station, NTTF Recommendation 2.3: Seismic submittal, Reference 4 and updated in Reference 5 were completed in accordance with Reference 3. As noted above, Fort Calhoun Station utilized a combination of vendor and station seismic walkdown teams. Due to the timing of these walkdowns, a Peer Review team comprised of 6 individuals was utilized.

The names of the peer review team are provided in Section 4.2 of Reference 4 and updated in Reference 5. The peer reviewer role is provided in Table 1 of References 4 and 5.

The lead peer reviewer, is identified in Section 4.2 of References 4 and 5. The scope of lead peer reviewer:

- Peer reviewed the SWEL
- Performed interviews of the seismic walkdown engineers via electronic communications
- Peer reviewed a sample of the checklists prepared for the Seismic Walkdowns and Area Walk-Bys
- Peer reviewed the submittal report in its entirety

Aside from the scope of the peer review as defined in Reference 3 and listed above, Lead peer reviewer was not involved with the SWEL preparation or disposition of any corrective actions. Lead peer reviewer acted as a Seismic Walkdown Engineer for a small portion of the SWEL items.

There are no differences between the information contained in the original submittal, References 4 and 5, and the information provided in this supplemental report.

The peer reviews and inspections were completed in accordance with Reference 3 as is consistent with the statements provided in References 4 and 5.