



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 17, 2014

Mr. Louis P. Cortopassi
Site Vice President and Chief Nuclear Officer
Omaha Public Power District
Fort Calhoun Station
9610 Power Lane, Mail Stop FC-2-4
Omaha, NE 68008

SUBJECT: FORT CALHOUN STATION, UNIT 1 – RELAXATION OF RESPONSE
DUE DATE REGARDING FLOODING HAZARD REEVALUATIONS FOR
RECOMMENDATION 2.1 OF THE NEAR-TERM TASK FORCE REVIEW
OF THE INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT (TAC NO.
MF3633)

Dear Mr. Cortopassi:

By letter dated March 12, 2012,¹ the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (henceforth referred to as the 50.54(f) letter). The NRC issued the request as a part of implementing lessons-learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested licensees to perform a reevaluation of all external flooding hazards using present-day guidance and methodologies.

By letter dated May 11, 2012,² the NRC issued a prioritization of due dates for responses from all sites. The flooding hazard reevaluation report (FHRR) was due on March 12, 2014, for Fort Calhoun Station, Unit 1 (FCS).

By letter dated August 26, 2013,³ Omaha Public Power District (OPPD, the licensee) requested NRC assistance in obtaining the U.S. Army Corps of Engineers (USACE) analysis of dams that could impact the flood levels at the FCS site. By letter dated February 26, 2014,⁴ OPPD requested a delay in submittal of the FHRR for FCS to 10 months after receiving the USACE final analysis. The reason for this request is that the results of the USACE analysis are necessary to complete the flooding hazard reevaluation (FHR) and that it would take about 10 months to incorporate the results and finalize the FHRR.

¹ The 50.54(f) letter is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML12053A340.

² The prioritization letter is available in ADAMS under Accession No. ML12097A509.

³ The request for assistance in obtaining USACE analysis is available in ADAMS under Accession No. ML13240A128.

⁴ The extension request from Omaha Public Power District is available in ADAMS under Accession No. ML14058A225.

The NRC reviewed the justification provided by the licensee and considered the following factors when reviewing the new schedule:

- By letter dated April 4, 2014,⁵ the NRC staff provided OPPD the USACE portion of the FCS FHR. The USACE portion of the FCS FHR resulted in a higher flood hazard relative to the FCS design basis. In a June 5, 2014,⁶ letter, OPPD provided interim actions it is taking or plans to take to address the higher flood hazard. The NRC staff is currently reviewing these interim actions and notes that OPPD is currently addressing the higher hazard due to the USACE FHR and is not waiting until the February 4, 2015, estimated time to complete the FCS FHRR to develop these interim actions.
- As stated in the NRC's interim staff guidance (ISG) JLD-ISG-2013-01, "Guidance for Assessment of Flooding Hazards Due to Dam Failure," dated July 29, 2013,⁷ evaluating flooding hazards for nuclear power plants needs to include consideration of floods resulting from dam failures. The FHR for FCS needs to consider the six Missouri River main stem dams that are operated by USACE. The NRC entered into an interagency agreement with the USACE to evaluate the Missouri River main stem dams and their potential hydrographs at FCS. The NRC also agreed to provide the necessary information for OPPD to complete its FHR. By letter dated April 4, 2014,⁸ the NRC transmitted the requested information to OPPD.
- As stated in the NRC's letter dated March 1, 2013,⁹ "incomplete hazard reports that only contain an analysis of some flooding hazard mechanisms would not be of substantive benefit for staff and would not be acceptable." Therefore, the licensee must incorporate the information requested from the USACE that was provided in the April 4, 2014, letter before a FHRR can be acceptable for submittal to the NRC in compliance with the request in the 50.54(f) letter.
- In the February 26, 2014, extension request OPPD provided a Gantt chart that included a detailed timeline for integrating various aspects of the FHR. This Gantt chart was discussed with OPPD in public meetings on May 9,¹⁰ and May 22, 2014.¹¹ OPPD provided a more detailed Gantt chart in the May 22, 2014, public meeting. The Gantt chart provides a detailed schedule and milestones to

⁵ NRC's cover letter transmitting the USACE FCS FHR is available in ADAMS under Accession No. ML14091A345

⁶ OPPD's cover letter transmitting the interim actions it will take or plans to take to address the USACE analysis which resulted in a higher flood hazard relative to the FCS design basis is in available in ADAMS under Accession No. ML14167A344.

⁷ JLD-ISG-2013-01 is available in ADAMS under Accession No. ML13151A153.

⁸ NRC's April 4, 2014, cover letter transmitting USACE FHR is available in ADAMS under Accession No. ML14091A345.

⁹ NRC's March 1, 2013, letter is available in ADAMS under Accession No. ML13044A561.

¹⁰ The May 9, 2014, meeting summary is available in ADAMS under Accession No. ML14139A358.

¹¹ The May 22, 2014, meeting summary is available in ADAMS under Accession No. ML14156A283.

be completed in order for OPPD to provide a FHRR 10 months after receiving the USACE results.

- As discussed in the May 9 and May 22, 2014, public meetings, OPPD is sharing resources with Nebraska Public Power District, which is developing a FHR for the Cooper Nuclear Station (CNS) site. Because of the limited number of technical experts who are available to perform this work, some of the FHR work for FCS and CNS cannot be done in parallel and must be done in series.
- The Missouri River watershed is a large and complex watershed and integrating the USACE results with the licensee-developed FHR being developed by OPPD independent of the USACE analysis takes time.

Given these considerations, the NRC considers the revised schedule proposed by OPPD to be acceptable. Accordingly, and based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the revised required response date for submitting the FHRR for FCS is February 4, 2015 (10 months after OPPD received the USACE final analysis).

If you have any questions regarding this matter, or if it is necessary to revise the submittal schedule, please contact your NRC project manager, Ms. Jennivine Rankin, at (301) 415-1530 or via e-mail at Jennivine.Rankin@nrc.gov

Sincerely,



Daniel H. Dorman, Acting Director
Office of Nuclear Reactor Regulation

Docket No. 50-285

cc: Listserv

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Sincerely,

/RA/

Daniel H. Dorman, Acting Director
Office of Nuclear Reactor Regulation

Docket No. 50-285

cc: Listserv

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*via email **Previously concurred

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