



EA-12-051

LIC-16-0062  
August 12, 2016

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

Fort Calhoun Station, Unit No. 1  
Renewed Facility Operating License No. DPR-40  
NRC Docket No. 50-285

Subject: Omaha Public Power District's Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

References: See Page 2 of Enclosure

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an Order (Reference 1) to all power reactor licensees and holders of construction permits in active or deferred status. The Order was effective immediately and required the Omaha Public Power District (OPPD) to install reliable spent fuel pool (SFP) level instrumentation at Fort Calhoun Station (FCS), Unit No. 1. Specific requirements are described in Attachment 2 of the Order.

Pursuant to Section IV, Condition C.2 of the Order, licensees are to provide a status report at six-month intervals following submittal of the Overall Integrated Plan, which OPPD submitted on February 28, 2013 (Reference 2). In February 2016, OPPD provided the sixth six-month status report (Reference 10) describing progress made in implementing the requirements of the Order; this letter provides the seventh six-month status report.

The Overall Integrated Plan (OIP) and subsequent six-month status reports (References 5 through 10) were prepared utilizing NEI guidance (Reference 3) as endorsed with exceptions and clarifications by the NRC in Reference 4. This seventh report provides an update on changes in schedule related to design and installation.

There are no regulatory commitments contained in this letter.

U. S. Nuclear Regulatory Commission

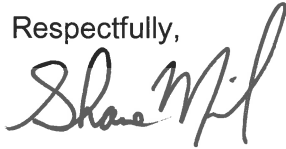
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If you should have any questions regarding this report, please contact Mr. Bradley H. Blome at 402-533-7270.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 12, 2016.

Respectfully,



Shane M. Marik  
Site Vice President and CNO

SMM/JKG/epm

Enclosure: Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

- c: W. M. Dean, Director of Office of Nuclear Reactor Regulation
- K. M. Kennedy, NRC Regional Administrator, Region IV
- C. F. Lyon, NRC Senior Project Manager
- M. A. Brown, NRC Project Manager
- S. M. Schneider, NRC Senior Resident Inspector

## **Fort Calhoun Station, Unit No. 1**

### **Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation**

#### **1 Introduction**

The Omaha Public Power District (OPPD) has developed an Overall Integrated Plan (OIP) (Reference 2) for Fort Calhoun Station documenting the requirements to install reliable Spent Fuel Pool Level Instrumentation (SFPLI), in response to Reference 1. This enclosure provides an update of milestone accomplishments since submittal of the OIP including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

#### **2 Milestone Accomplishments**

The following milestones have been completed since the development of the OIP, and are current as of August 4, 2016.

- Procured the Spent Fuel Pool Instrumentation in July 2013.
- Completed Conceptual Design Package in December 2013.
- Began Final Design Package in November 2014
- Finalizing Final Design Package August 2015
- Factory Acceptance Test SFPLI January 2016
- Receipt of Spent Fuel Pool (SFP) Instruments March 2016
- Begin Installation of SFP Instruments May 2016

#### **3 Milestone Schedule Status**

This section provides the activity status of each item, and the expected completion date noting any change. The Attachment to this enclosure contains an update to the Milestone Schedule to support the OIP. The dates are planning dates subject to change as design and implementation details are developed.

The Attachment is formatted to align with the table provided in the Nuclear Energy Institute's (NEI) Six-Month Status Report Template and supersedes the initial Milestone Schedule provided in Reference 2 and interim Milestone Schedules provided in References 5, 6, 7, 8, 9 and 10.

#### **4 Changes to Compliance Method**

There are no changes to the compliance method as documented in the Overall Integrated Plan.

#### **5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

OPPD is requesting a relaxation in the effective date of the order to August 31, 2017 in Reference 11.

#### **6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

There are no open items to report at this point in time regarding the Overall Integrated Plan or the Draft Safety Evaluation.

## 7 References

The following references support the updates to the OIP described in this submittal.

1. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ML12056A044) (NRC-12-0023)
2. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Fort Calhoun Station Spent Fuel Pool Instrumentation Overall Integrated Plan," dated February 28, 2013, (ML13059A268) (LIC-13-0011)
3. Nuclear Energy Institute (NEI) 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, dated August 2012, (ML12240A307)
4. NRC Interim Staff Guidance, JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012, (ML12221A339)
5. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Omaha Public Power District's First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated August 28, 2013, (ML13241A411) (LIC-13-0124)
6. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Omaha Public Power District's Second Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated February 24, 2014, (ML14055A397) (LIC-14-0023)
7. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Omaha Public Power District's Third Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated August 25, 2014 (ML14237A574) (LIC-14-0101)
8. Letter from OPPD (Edwin D. Dean) to NRC (Document Control Desk), "Omaha Public Power District's Fourth Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated February 27, 2015 (ML15058A738) (LIC-15-0024)
9. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Omaha Public Power District's Fifth Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated August 19, 2015 (ML15231A597) (LIC-15-0096)
10. Letter from OPPD (Shane M. Marik) to NRC (Document Control Desk), "Omaha Public Power District's Sixth Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated February 26, 2016 (ML16057A060) (LIC-16-0009)
11. Letter from OPPD (Shane M. Marik) to NRC (Document Control Desk), "Request for Relaxation of March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events and Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-049 and EA-12-051)," dated August 12, 2016 (LIC-16-0048)

Attachment: SFPLI Overall Integrated Implementation Plan Milestone Schedule, Revision 7  
**Fort Calhoun Station EA-12-051 SFPLI Overall Integrated Implementation Plan**

**Milestone Schedule  
 Revision 7**

The following milestone schedule is provided. The dates are planning dates subject to change as design and implementation details are developed. Any changes to the following target dates will be reflected in subsequent 6-month status reports.

| <b>Milestone</b>                              | <b>Target Completion Date</b> | <b>Activity Status</b> | <b>Revised Target Completion Date</b> |
|---|-------------------------------|------------------------|---------------------------------------|
| Submit 60-Day Status Report                   | October 27, 2012              | Complete               | N/A                                   |
| Submit Overall Integrated Plan                | February 28, 2013             | Complete               | N/A                                   |
| <b>Submit Six-Month Updates:</b>              |                               |                        |                                       |
| Update 1                                      | August 28, 2013               | Complete               | N/A                                   |
| Update 2                                      | February 28, 2014             | Complete               | N/A                                   |
| Update 3                                      | August 28, 2014               | Complete               | N/A                                   |
| Update 4                                      | February 28, 2015             | Complete               | N/A                                   |
| Update 5                                      | August 28, 2015               | Complete               | N/A                                   |
| Update 6                                      | February 28, 2016             | Complete               | N/A                                   |
| Update 7                                      | August 12, 2016               | Planned                | N/A                                   |
| <b>Modifications:</b>                         |                               |                        |                                       |
| Conceptual Design                             | 4Q2013                        | Complete               | N/A                                   |
| Begin Detailed Design Engineering             | 4Q2014                        | Complete               | N/A                                   |
| NRC Audit Mohr SFPLI System                   | 2Q2014                        | Complete               | N/A                                   |
| Procure SFPLI Equipment                       | 3Q2013                        | Complete               | N/A                                   |
| Complete and Issue SFPLI Modification Package | 3Q2015                        | Complete               | N/A                                   |
| Receipt of Spent Fuel Pool (SFP) Instruments  | 4Q2015                        | Complete               | N/A                                   |

| <b>Milestone</b>  | <b>Target Completion Date</b> | <b>Activity Status</b> | <b>Revised Target Completion Date</b> |
|---|-------------------------------|------------------------|---------------------------------------|
| Begin Installation, includes Complete Functional Test of SFP Instruments                                    | 2Q2016                        | In-Process             | N/A                                   |
| Complete SFPLI Installation and Put Into Service, includes SFP Instrument Operational And Training complete | 2Q2016                        | Not Started            | 4Q2016                                |