Omaha Public Power District

LIC-16-0066
October 31, 2016

EA-13-243

Mr. K. M. Kennedy
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

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

Subject: Closure of Remaining Confirmatory Action Letter Commitments

References: See Page 5

Dear Mr. Kennedy:

In Reference 1, Omaha Public Power District (OPPD) made post-restart commitments associated with Fort Calhoun Station (FCS) which were confirmed in a NRC Confirmatory Action Letter (CAL) (Reference 2). In early 2016, the NRC completed a Confirmatory Action Letter Follow up Inspection (Reference 3) and closed a number of the CAL commitments. The Inspection Report also identified eight (8) action items (AI) within the CAL that remained open. OPPD is requesting closure of these remaining commitments based on the OPPD's decision to permanently cease FCS operations.

By letter dated June 24, 2016 (Reference 4), OPPD provided formal notification to the NRC pursuant to 10 CFR 50.4(b)(8) and 10 CFR 50.82(a)(1)(i) of OPPD's contingent determination to permanently cease power operations at FCS no later than December 31, 2016. OPPD updated this letter on August 25, 2016 (Reference 5) certifying that it plans to permanently cease power operations at FCS on October 24, 2016. FCS ceased power operations on October 24, 2016. FCS intends to permanently remove all fuel from the reactor vessel in November 2016.

The specific bases for closing the remaining eight open CAL action items is provided on the following pages. The eight items are grouped into the three categories as they were listed in NRC Inspection Report (Reference 3) including the reference, AI number and description from Section 5 of the report.

4OA4.1.4: Design and Licensing Basis (2013-0086)

AI Number	Description
2013-05570-049	**CAPR-3- Modify the Engineering Support Personnel Training (ESPT) initial and continuing training programs to incorporate CAPR-1 and CAPR-2. Training shall include items 1, 2 and 3 from CAPRs 1 and 2 to address the identification of design and licensing bases, record types that are included, and the method of retrieval**
2013-05570-026	**Identify and define the current licensing bases and assure licensing bases documentation remains current, accurate, complete, and retrievable.**
2013-05570-076	**Identify and define the design bases and assure design bases documentation remains current, accurate, complete, and retrievable.**
2013-05570-092	**Complete Phase 3 of the Key Calculation Project. Phase 3 consists of revising any deficient critical calculation or engineering analysis identified from Phase 2, as needed.**
2013-05570-093	**Validate the design and licensing basis has been translated into plant operation by verifying that the operation, surveillance, and maintenance of the safety-related components do not compromise the design and licensing basis.**

These actions were being addressed by the OPPD design and licensing basis project (DLBRP). The DLBRP was suspended indefinitely since the majority of plant systems will no longer be required when FCS is permanently defueled. When the DLBRP was suspended, the project was approximately fifty percent complete with key systems such as raw water and component cooling water project reviews completed. Before the DLBRP was suspended, approximately sixty discrepancies were identified and entered in the station's corrective action program. None of these issues were determined by Shift Management to result in a significant operational concern nor would they significantly impact functions needed to maintain the plant in a permanently defueled status.

As part of the decommissioning process, FCS has developed Decommissioning Project Plans (DPP) to address plant systems and equipment that will be necessary to support a permanently defueled status, as well as equipment abandonment and removal. Information from the DLBRP will be utilized during the implementation of the DPPs including decommissioning updates of the Technical Specifications and Updated Safety Analysis Report (USAR). Some of the key DPPs are listed below:

FC-DPP-11 Spent Fuel Pool Configuration Plan
FC-DPP-13 Decommissioning Support Systems Identification Plan
FC-DPP-14 Decommissioning Power Study Plan
FC-DPP-18 Decommissioning Accident Analysis Plan
FC-DPP-20 Maintenance Rule Program
FC-DPP-23 Fire Protection Program Revision Plan
FC-DPP-28 PSDAR Preparation Plan
FC-DPP-30 USAR Update Plan
FC-DPP-44 Personnel Training Plan
FC-DPP-45 50.59 Safety Review Process

FC-DPP-48	Spent Fuel Strategy
FC-DPP-50	Procedures
FC-DPP-51	Technical Specifications
FC-DPP-57	System Abandonment
FC-DPP-58	Underground Piping and Tanks

4OA4.4: Actions Associated with Containment Internal Structures (2013-0013)

AI Number	Description
2012-04392-014 **2012-04392-045**	**Evaluate the structural design margin for the containment internal structures, and reactor cavity and compartments, and resolve any deficiencies in accordance with its corrective action program (CAP)**
2012-04392-048	**Regarding Beam 22A and Beam 22B in the containment internal structures resolve any deficiencies in accordance with the CAP.**

The remaining actions associated with Containment Internal Structures will no longer be relevant when FCS is permanently defueled. Once the plant is in the defueled condition it is no longer allowed the use the facility for power operation or emplacement of fuel into the reactor vessel as provided in 10 CFR 50.82(a)(2) so the requirements placed on the Containment are no longer applicable. As a result, OPPD has withdrawn the License Amendment Request (LAR) that was associated with this issue (Reference 6). While not part of the CAL actions, FCS continues to track deficiencies with the auxiliary building structure in CAP (CR 2012-04392-012). A subsequent LAR (Reference 7) has been submitted to assist in resolving those issues.

4OA4.1.8.f: Piping Code and System Classification and Analysis (2013-0071)

AI Number	Description
2012-07724-023	**Provide calculations documenting thermal fatigue analysis on the Class I piping systems for primary plant sampling, reactor coolant gas vent, reactor coolant, safety injection, and waste disposal in accordance with USAS B31.7 Draft 1968**

The commitment to resolve thermal fatigue on Class I piping systems is not relevant since thermal fatigue conditions will not exist once FCS is permanently defueled. The scope included in USAS B31.7 Section 700.1 includes; "Piping systems for which rules are specified by this Code are those that are designed to provide a pressure-retaining barrier in a nuclear power plant or to provide for the overall containment of the nuclear plant." The limits on the Class I piping can no longer be exceeded without a pressure source. Also, 10 CFR 50.82, "Termination of license," states that, "upon docketing of the certifications for permanent cessation of operations and permanent removal of fuel from the reactor vessel..., the 10 CFR part 50 license no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel." As such, the requirements of USAS B31.7, no longer apply to the piping systems in such a condition because the reactor coolant, safety injection, and waste disposal pressure boundary will no longer be used as a pressure retaining or fission product barrier when the reactor vessel is permanently defueled.

Based on the above information, OPPD is requesting closure of the eight remaining CAL commitments.

There are no regulatory commitments contained within this letter.

If you should have further questions, please contact Mr. Bradley H. Blome, Manager - Site Regulatory Assurance, at 402-533-7270.

Respectfully,

Michael J Prospero FOR

Shane M. Marik
Site Vice President and CNO

SMM/cac

cc: C.F. Lyon, NRC Project Manager
S. M. Schneider, NRC Senior Resident Inspector

REFERENCES

1. OPPD Letter (L. P. Cortopassi) to USNRC (M. L. Dapas), "Integrated Report to Support Restart of Fort Calhoun Station and Post-Restart Commitments for Sustained Improvement," dated December 2, 2013 (LIC-13-0164) (ML13336A785)

2. NRC Letter (M. L. Dapas) to OPPD (L. P. Cortopassi), "Confirmatory Action Letter – Fort Calhoun Station," dated December 17, 2013 (ML13351A395)

3. NRC Letter (J. Sowa) to OPPD (S. M. Marik), "Fort Calhoun Station - NRC Confirmatory Action Letter Follow up Inspection 05000285/2016007," dated February 11, 2016 (ML16042A542)

4. OPPD Letter (T. Burke) to USNRC (Document Control Desk), "Certification of Permanent Cessation of Power Operations," dated June 24, 2016 (LIC-16-0043) (ML16176A213)

5. OPPD Letter (T. Burke) to USNRC (Document Control Desk), "Certification of Permanent Cessation of Power Operations," dated August 25, 2016 (LIC-16-0067) (ML16242A127)

6. OPPD Letter (S. M. Marik) to USNRC (Document Control Desk), "Withdrawal of License Amendment Request - 15-03, Revise Current Licensing Basis to Use ACI Ultimate Strength Requirements," dated July 27, 2016 (LIC-16-0051) (ML16209A126)

7. OPPD Letter (S. M. Marik) to USNRC (Document Control Desk), "License Amendment Request 16-04: Revise Current Licensing Basis to USE ACI Ultimate Strength Requirements," dated October 25, 2016 (LIC-16-0093)