



LIC-17-0029
March 10, 2017

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: Confirmatory Action Letter Commitments Follow Up

References: See Page 3

Dear Mr. Kennedy:

By letter dated June 24, 2016 (Reference 4), Omaha Public Power District (OPPDP) provided formal notification to the NRC pursuant to 10 CFR 50.4(b)(8) and 10 CFR 50.82(a)(1)(i) of OPPDP's contingent determination to permanently cease power operations at Fort Calhoun Station (FCS) no later than December 31, 2016. OPPDP updated this letter on August 25, 2016 (Reference 5) certifying that it plans to permanently cease power operations at FCS on October 24, 2016. OPPDP certified to the NRC that all fuel was permanently removed from the FCS reactor pressure vessel on November 13, 2016 (Reference 7).

In Reference 1, OPPDP made post-restart commitments associated with 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. In Reference 6, OPPDP provided information on the 8 open AIs and requested closure of the remaining commitments based on the OPPDP's decision to permanently cease FCS operations. The NRC responded (Reference 8) to OPPDP's request and stated additional information would be needed related to the spent fuel pool.

Based on additional discussions with NRC staff, OPPDP is proposing that the open CAL items associated with the design and licensing basis project (DLBRP) be closed to a new commitment that is more appropriate for the facility's decommissioning status. The following commitment would replace AIs 2013-05570-049, 2013-05570-026, 2013-05570-076, 2013-05570-092 and 2013-05570-093 from Reference 6:

1. Complete the following design and licensing basis reconstitution actions for sections directly associated with the spent fuel pool, spent fuel pool cooling, and directly required supporting structures, systems and components:
 - a) Identify and define the current design and licensing bases that support decommissioning functions and assure the bases are current, accurate, complete and retrievable.

- b) Complete Phase 3 of the Key Calculation Project. Phase 3 consists of revising any deficient critical calculation or engineering analysis identified in Phase 2, as needed for facility decommissioning.
- c) Validate the design and licensing basis has been translated into facility decommissioning by verifying that the operation, surveillance, maintenance and training of safety-related components do not compromise the design and licensing basis.

The above activities will be completed as they relate to facility decommissioning and will be performed for the following USAR Sections:

- Section 5.7 - Structures, Piling
- Section 5.11- Structures, Structures other than containment
- Section 8.3 - Electrical systems, Station Distribution
- Section 9.5 - Auxiliary Systems, Refueling System
- Section 9.6 - Auxiliary System, Spent Fuel Pool Cooling System
- Section 9.7 - Auxiliary Systems, Component Cooling Water System
- Section 9.8 - Auxiliary Systems, Raw Water system
- Appendix F - Classification of Structures and Equipment and Seismic Criteria

-OR-

- 2. Submit a License Amendment Request (LAR) for an independent spent fuel cooling system.

The completion date for this commitment is December 29, 2017. The above actions have been entered into the FCS corrective action program as condition report (CR) 2017- 00842.

Based on the above information and the information contained in Reference 6, OPPD is requesting closure of the FCS CAL commitments. Attachment 1 of this letter contains the new regulatory commitments.

If you should have further questions, please contact Mr. Bradley H. Blome, Directory – Licensing & Regulatory Assurance, at 402-533-7270.

Respectfully,



Mary J. Fisher
Senior Director FCS Decommissioning

Attachment 1. Regulatory Commitments

BHB/cac/epm

- c: U. S. NRC Document Control Desk
J. S. Kim, 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), "Closure of Remaining Confirmatory Action Letter Commitments," dated October 31, 2016 (LIC-16-0066) (ML16305A104)
7. OPPD Letter (T. J. Burke) to USNRC (Document Control Desk), "Certification of Permanent Removal of Fuel from the Reactor Vessel," dated November 13, 2016 (LIC-16-0074) (ML16319A254)
8. NRC Letter (K. M. Kennedy) to OPPD (S. M. Marik), "Response to Request to Close Remaining Confirmatory Action Commitments," dated December 29, 2016 (ML16364A332)

Regulatory Commitments

This table identifies actions discussed in this letter for which OPPD commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
<p>1) Complete the following design and licensing basis reconstitution actions for sections directly associated with the spent fuel pool, spent fuel pool cooling, and directly required supporting structures, systems and components:</p> <p>a) Identify and define the current design and licensing bases that support decommissioning functions and assure the bases are current, accurate, complete and retrievable.</p> <p>b) Complete Phase 3 of the Key Calculation Project. Phase 3 consists of revising any deficient critical calculation or engineering analysis identified in Phase 2, as needed for facility decommissioning.</p> <p>c) Validate the design and licensing basis has been translated into facility decommissioning by verifying that the operation, surveillance, maintenance and training of safety-related components do not compromise the design and licensing basis.</p> <p>The above activities will be completed as they relate to facility decommissioning and will be performed for the following USAR Sections:</p> <ul style="list-style-type: none"> • Section 5.7 - Structures, Piling • Section 5.11- Structures, Structures other than containment • Section 8.3 - Electrical systems, Station Distribution • Section 9.5 - Auxiliary Systems, Refueling System • Section 9.6 - Auxiliary System, Spent Fuel Pool Cooling System • Section 9.7 - Auxiliary Systems, Component Cooling Water System • Section 9.8 - Auxiliary Systems, Raw Water system • Appendix F - Classification of Structures and Equipment and Seismic Criteria <p>-OR-</p>	X		Complete by 12/29/2017
<p>2) Submit a License Amendment Request (LAR) for an independent spent fuel cooling system.</p>	X		Submitted by 12/29/2017