

NRR-PMDAPEm Resource

From: Kim, James
Sent: Tuesday, March 21, 2017 1:48 PM
To: MATZKE, ERICK P
Cc: BLOME, BRADLEY H
Subject: FORT CALHOUN STATION - FINAL RAI Regarding Proposed Emergency Planning Exemption (CAC NO. MF9067)

Final Request for Additional Information

On March 15, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff sent Fort Calhoun Station (FCS) the draft Request for Additional Information (RAI). This RAI relates to exemptions from portions of Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR Part 50) for the FCS Radiological Emergency Response Plan.

On March 21, 2017, a teleconference between FCS and NRC staff was held to discuss the information requested by the NRC staff was understood and any additional clarifications on the RAI were required. Based on the teleconference, a minor change was made to the question RAI-SBPB-02. FCS determined that the information requested by the NRC staff was understood and any other additional clarifications on the RAI was not necessary. FCS agreed to provide a response to this **final** RAI shown below within 30 days from the date of this correspondence. The NRC staff also informed the licensee that a publicly available version of this final RAI would be placed in the NRC's Agencywide Documents Access and Management System.

REQUEST FOR ADDITIONAL INFORMATION
DEFUELED EMERGENCY PLAN EXEMPTION REQUEST
OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION
DOCKET NO. 50-285

By letter dated December 16, 2016 (Agency-wide Documents Access and Management System (ADAMS) Accession No. ML16356A578), as supplemented by letter dated February 10, 2017 (ADAMS Accession No. ML17041A443), Omaha Public Power District (OPPD) requested exemptions from portions of Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR Part 50) for the Fort Calhoun Station (FCS) Radiological Emergency Response Plan. Specifically, OPPD requested exemption from certain Emergency Plan Requirements contained in 10 CFR 50.47(b), 10 CFR 50.47(c)(2), and Section IV to Appendix E of 10 CFR Part 50. The requested exemptions would allow OPPD to modify the FCS emergency plan commensurate with the reduced likelihood of significant radiological events presented by the permanently defueled condition of the reactor and low decay heat rate of the stored fuel.

The U.S. Nuclear Regulatory Commission staff has reviewed the OPPD submittal and determined that additional information is required in order to complete the review. Based on precedent reviews for similar exemption requests by facilities in decommissioning, the NRC staff developed NSIR/DPR-ISG-02, "Interim Staff Guidance: Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants," May 11, 2015 (ADAMS Accession No. ML14106A057). This guidance specifies that the risk reduction measures identified in NUREG-1738, "Technical Study of Spent Fuel Pool Accident Risk at Decommissioning Nuclear Power Plants," February 2001, as Industry Decommissioning Commitments (IDC) and Staff Decommissioning Assumptions (SDA), listed in Tables 4.1-1 and 4.1-2 of that document should be addressed to support the

exemption request. The staff identified the following areas where clarification of the IDC and SDA responses is necessary.

RAI-SBPB-01:

IDC 5 of NUREG-1738 specifies that spent fuel pool (SFP) instrumentation will include readouts and alarms in the control room (or where personnel are stationed) for SFP temperature, water level, and area radiation levels. The response indicated that SFP level is monitored each shift as part of operator rounds. Clarify the location of the SFP water level instrument display and describe the expected reliability of the instrument in identifying abnormal SFP water levels. Also, explain how indication of abnormal SFP level based on control room indication (alarm only) is adequate to drive the response to an abnormal SFP water level.

RAI-SBPB-02:

SDA-3 of NUREG-1738 specifies control room instrumentation will directly measure SFP temperature and water level. Explain how this risk reduction measure is satisfied by the existing temperature instruments. The response should address the reliability of the plant computer for monitoring of SFP temperature and the temperature instruments used to identify emergency action levels related to SFP temperature.

Regards,

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