



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-451

April 12, 2017

EA-13-243

Ms. Mary J. Fisher
Senior Director – FCS Decommissioning
Omaha Public Power District
Fort Calhoun Station
Mail Stop FC-2-4
9610 Power Lane
Blair, NE 68008

SUBJECT: CLOSURE OF CONFIRMATORY ACTION LETTER COMMITMENTS

Dear Ms. Fisher:

The purpose of this letter is to inform you of the U.S. Nuclear Regulatory Commission's (NRC) decision to close the remaining open commitments associated with Fort Calhoun Station Confirmatory Action Letter (CAL), issued on December 17, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13351A395).

NRC Inspection Report 05000285/2016007, dated February 11, 2016, (ADAMS Accession No. ML16042A542), documented the status of NRC inspection activities related to the CAL commitments. Based on NRC inspection activities to that point, all but eight actions associated with the CAL had been closed. In a letter dated October 31, 2016, (ADAMS Accession No. ML16305A104), Omaha Public Power District (OPPD) requested that the NRC close the remaining eight open commitments in the CAL.

OPPD requested closure of these open commitments based on their decision to permanently cease operations of the Fort Calhoun Station. On March 10, 2017, OPPD provided additional information to support the request (ADAMS Accession No. ML17069A441). OPPD proposed that the remaining open commitments 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, specifically:

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.

-OR-

- 2. Submit a License Amendment Request for an independent spent fuel cooling system. This includes completing the design and licensing basis changes associated with the independent spent fuel pool cooling and directly required supporting structures, systems, and components.

OPPD committed to complete these actions by December 29, 2017.

Based on the additional information and new commitment provided in the March 10, 2017, letter, the NRC has closed all remaining commitments documented in our CAL dated December 17, 2013. The basis for closure of these commitments is provided in Enclosure 1. Inspection of the new commitment, tracked by Fort Calhoun Station Condition Report CR 2017-00842, will occur as part of the NRC's ongoing decommissioning activities and will be documented in future inspection reports.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding."

Please contact Ray Kellar at 817-200-1191, with any questions you may have regarding this letter.

Sincerely,

/RA/

Kriss M. Kennedy
Regional Administrator

Docket No. 50-285
License No. DPR-40

Enclosure:
As stated

CLOSURE OF REMAINING CONFIRMATORY ACTION LETTER COMMITMENTS –
DATED APRIL 12, 2017

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SUNSI Review ADAMS: Non-Publicly Available Non-Sensitive Keyword: NRC-002
 By:JDixon Yes No Publicly Available Sensitive

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NRC Inspection Report 05000285/2016007, dated February 11, 2016, documented the status of NRC inspection activities related to the Confirmatory Action Letter (CAL) commitments. Based on NRC inspection activities to that point, all but eight actions associated with the CAL were closed. The table below lists the open actions associated with the Fort Calhoun Station Confirmatory Action Letter, issued on December 17, 2013, and the basis for closing each item.

Actions Associated with Containment Internal Structures	
Action Item Number	Description
2012-04392-014 2012-04392-045	Evaluate the structural design margin of 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.
Closure basis: The NRC concluded that with fuel permanently removed from the reactor vessel, these actions are no longer necessary because potential fuel-related accident scenarios are limited to the spent fuel pool. There are no potential scenarios where the failure of containment internal structures, reactor cavity and components, and Beam 22A and Beam 22B could contribute to a spent fuel pool accident.	
Piping Code and System Classification and Analysis	
Action Item Number	Description
2012-07724-023	Provide calculations documenting thermal fatigue analysis on the Class 1 piping systems for primary plant sampling, reactor coolant gas vent, reactor coolant, safety injection, and waste disposal in accordance with USAS [USA Standard Code] B31.7 Draft 1968.
Closure basis: The NRC concluded that thermal fatigue on Class 1 piping is no longer a concern since the piping systems for primary plant sampling, reactor coolant gas vent, reactor coolant, safety injection, and waste disposal are no longer used as pressure retaining or fission product barriers.	
Design and Licensing Basis	
Action Item Number	Description
2013-05570-049	CAPR [Corrective Action to Prevent Recurrence] -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.

<p>Closure basis: Engineering Support Personnel Training is only necessary for those items related to the spent fuel pool and support systems. The training aspects necessary for addressing the design and licensing basis for the spent fuel pool, spent fuel pool cooling, and the required supporting structures, systems, and components will be captured as part of a new commitment in the Fort Calhoun Station corrective action program, Condition Report CR 2017-00842.</p>	
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.
<p>Closure basis: Since these items were for addressing an operating reactor, more structures, systems, and components are included than are required to be maintained based on the permanently defueled status. However, since spent fuel pool accidents must still be addressed, the spent fuel pool, spent fuel pool cooling, and the required supporting structures, systems, and components are still of concern. Fort Calhoun Station has captured these concerns as a commitment in the corrective action program, Condition Report CR 2017-00842.</p>	

Omaha Public Power District's, Fort Calhoun Station, commitment, Condition Report CR 2017-00842 requires:

- Completing the design and licensing basis reconstitution action for sections directly associated with the spent fuel pool, spent fuel pool cooling, and directly required supporting structures, systems, and components by completing:
 - Identify and define the current design and licensing bases that support decommissioning functions and assure the bases are current, accurate, complete, and retrievable.
 - 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.

- 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.

OR

- Submit a License Amendment Request for an independent spent fuel cooling system. This includes completing the design and licensing basis changes associated with the independent spent fuel pool cooling and directly required supporting structures, systems, and components.

Therefore, all remaining EA-13-243 Confirmatory Action Letter Commitments and the December 17, 2013, Confirmatory Action Letter are closed. We understand that the new commitments associated with insuring spent fuel safety will be accomplished by December 29, 2017. Inspection of the new commitment, tracked by Fort Calhoun Station Condition Report CR 2017-00842, will occur as part of the NRC's ongoing decommissioning activities and will be documented in future decommissioning reports.