



LIC-17-0057
June 5, 2017

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

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

Subject: Submission of Corrected Page for; Request for Partial Exemption from Record Retention Requirements (CAC NO. MF9693)

Reference:

1. Letter from OPPD (M. J. Fisher) to USNRC (DCD), "Request for Partial Exemption from Record Retention Requirements," dated May 4, 2017 (LIC-17-0043) (Adams Accession Number ML17125A073)

In Reference 1, the Omaha Public Power District (OPPD) in reference 1 submitted "Request for Partial Exemption from Record Retention Requirements."

This letter provides a corrected page to the request. This letter contains no regulatory commitments.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Bradley H. Blome at (402) 533-7270.

Respectfully,

Bradley H. Blome
Director Licensing and Regulatory Assurance

BHB/epm

Attachments:

1. Corrected Page 6 to Attachment to OPPD's Request for Partial Exemption from Record Retention Requirements
- c: K. M. Kennedy, NRC Regional Administrator, Region IV
J. S. Kim, NRC Project Manager
R. S. Browder, NRC Senior Health Physicist, Region IV

ATTACHMENT 1

**Request for Partial Exemption from Record Retention Requirements
LIC-17-0043 Attachment
corrected page 6**

**OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION. UNIT NO. 1
DOCKET NO. 50-285**

Paragraph 50.71(c), states in part: "Records that are required by the regulations in this part or Part 52 of this chapter, by license condition, or by technical specifications must be retained for the period specified by the appropriate regulation, license condition, or technical specification. If a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license..."

The common and underlying purpose for the records related regulations cited above is to ensure that the licensing and design basis of the facility is understood, documented, preserved and retrievable relative to establishing and maintaining the SSC's safety functions for the life of the facility. These regulations, however, do not consider the reduction in safety related SSCs during the decommissioning process. Removal of the SSCs from the licensing basis has been, or will be, evaluated in accordance with the applicable change process in the regulations, e.g., 10 CFR 50.59, or NRC approved license amendment, to have no adverse public health and safety impact prior to elimination of any records. Elimination of associated records for these SSCs can have no additional impact. Retention of records associated with SSCs that are or will no longer be part of the facility licensing basis serves no safety or regulatory purpose. Ultimately, the SSCs will be physically removed from the facility. Therefore, application of these record requirements in those circumstances does not serve the underlying purpose of the regulations.

Based on the above, the application of the subject record keeping requirements to the FCS records specified above is not required to achieve the underlying purpose of the rule. Thus, special circumstances are present which the NRC may consider, pursuant to 10 CFR 50.12(a)(2)(ii), to grant the requested exemption.

2. 10 CFR 50.12(a)(2)(iii): Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted.

The records retention requirements applied by the NRC to the construction and operation of nuclear power plants are intended to demonstrate, on a broad basis, that SSCs and activities are supportive of the safety analysis and the requirements of the NRC license for an operating reactor and operability of its safety functions. The records program requirements provide assurance that records will be captured, indexed, and stored in an environmentally suitable and retrievable condition resulting in a significant volume of records of many forms and a significant associated cost. The burden associated with the operations phase records requirements was understood and considered appropriate by the NRC and their reactor licensees. However, the effect of the operations phase record retention requirements that survived the life of a facility and no longer served an underlying safety purpose were not fully understood or considered. This is the current situation at the decommissioning facilities. The operating reactor records retention requirements to which FCS is currently regulated are no longer necessary nor appropriate in that the SSCs and activities to which many of the records apply are no longer important to the facility, the public or worker health and safety.