



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 5, 2017

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

Dear Ms. Fisher:

**SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 – REQUEST FOR ADDITIONAL INFORMATION REGARDING POST-SHUTDOWN DECOMMISSIONING ACTIVITIES REPORT (CAC NO. MF9536)**

Dear Ms. Fisher:

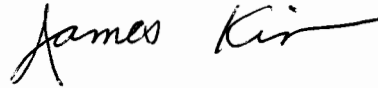
The U.S. Nuclear Regulatory Commission (NRC) staff is conducting a review of the Omaha Public Power District's Post-Shutdown Decommissioning Activities Report (PSDAR), dated March 30, 2017, including the Site-Specific Decommissioning Cost Estimate, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Sections 50.82(a)(4)(i) and 50.82(a)(8)(iii) for Fort Calhoun Station, Unit No. 1.

The environmental impacts of site-specific decommissioning activities documented in the PSDAR are being evaluated against the requirements in 10 CFR 50.82(4)(i), 50.82(5) and 50.82(6)(ii) and the guidance in Regulatory Guide 1.185, "Standard Format And Content For Post-Shutdown Decommissioning Activities Report". Additional information is needed for the NRC staff to determine whether the PSDAR contains the information required by these regulations. In particular, the additional information requested in the enclosure is needed regarding the basis for concluding that the environmental impacts associated with site-specific decommissioning activities are bounded by previously issued environmental impact statements for Fort Calhoun Station, such as the Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities (NUREG-0586), Supplement 1, Regarding the Decommissioning of Nuclear Power Plants (November 2002) and the site-specific Supplement 12, Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437) Regarding Fort Calhoun Station, Unit 1.

A draft request for additional information was forwarded to your staff on May 19, 2017. The NRC staff requests that you respond to them within 30 days of the date of this letter.

If you have any questions, please contact me at 301-415-4125 or via e-mail at [James.Kim@nrc.gov](mailto:James.Kim@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "James Kim". The signature is written in a cursive style with a long horizontal stroke at the end.

James Kim, Project Manager  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosure:  
Questions and Concerns

cc: Listserv

REQUEST FOR ADDITIONAL INFORMATION

POST-SHUTDOWN DECOMMISSIONING ACTIVITIES REPORT

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

By letter dated March 30, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17089A759), the Omaha Public Power District's (OPPD, the licensee) submitted Post-Shutdown Decommissioning Activities Report (PSDAR) for Fort Calhoun Station, Unit No. 1 (Fort Calhoun) to satisfy Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.82(a)(4) and generally follow the guidance contained in Regulatory Guide (RG) 1.185, Revision 1, "Standard Format and Content for Post-Shutdown Decommissioning Activities Report," June 2013 (ADAMS Accession No. ML13140A038), governing the PSDAR content and the use of NUREG-0586, Supplement 1, "Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities," November 2002 (Decommissioning GEIS) (ADAMS Accession No. ML023470304), as appropriate.

In a PSDAR, a licensee must provide reasons for concluding that the environmental impacts associated with site-specific decommissioning activities will (or will not) be bounded by previously issued environmental impact statements such as the construction final environmental statement (FES), operation FES, license renewal (LR) supplemental environmental impact statement (SEIS), or the Decommissioning GEIS (NUREG-0586).

Question 1: Identification of Federally and State-listed Species

10 CFR 50.82(a)(4)(i) states:

Prior to or within 2 years following permanent cessation of operations, the licensee shall submit a post-shutdown decommissioning activities report (PSDAR) to the NRC, and a copy to the affected State(s). The PSDAR must contain a description of the planned decommissioning activities along with a schedule for their accomplishment, a discussion that provides the reasons for concluding that the environmental impacts associated with site-specific decommissioning activities will be bounded by appropriate previously issued environmental impact statements, and a site-specific DCE, including the projected cost of managing irradiated fuel.

10 CFR 50.82(a)(6) states, in part, that "Licensees shall not perform any decommissioning activities, as defined in [10 CFR] 50.2, that . . . Result in significant environmental impacts not previously reviewed . . . ."

The OPPD PSDAR provides an assessment of environmental impacts associated with decommissioning activities at Fort Calhoun. The NRC staff has determined that the

Section 5.1.7, "Threatened and Endangered Species," in the PSDAR did not identify or discuss the potential occurrence and impacts to two federally and State-listed species.

As noted by OPPD in its PSDAR, the Decommissioning GEIS states that a site-specific analysis should be conducted to determine the impacts from decommissioning activities to federally and State threatened and endangered species. Section 4.3.7.3, "Evaluation," of the Decommissioning GEIS specifically states that the likelihood of impacts to threatened and endangered species is related to their presence or absence, and the site-specific analysis should include identification of federally and State-listed species that have the potential to occur at the site.

To determine the potential presence of threatened and endangered species at Fort Calhoun, OPPD reviewed the federally and State-listed species described in NRC's LR SEIS (NUREG-1437, Supplement 12). In its PSDAR, OPPD discussed State-listed species that are also federally listed, but did not discuss any species that are only State-listed. For federally listed species, OPPD discussed federally threatened and endangered species that were included in the Fort Calhoun LR SEIS. However, the Fort Calhoun LR SEIS did not address updates to the FWS list of threatened and endangered species. In addition, RG 1.185 states that the list of threatened and endangered species has likely changed since the most recent environmental document was published, and therefore, licensees "should obtain a current list from the appropriate U.S. Fish and Wildlife Service office and should make a determination as to the likelihood that a protected species is found on the site. If any species is likely to be affected by the decommissioning of the facility, the PSDAR should identify this potential."

The NRC staff reviewed FWS's Information, Planning, and Conservation System, which is a database that provides occurrence data for federally listed species, and determined that a total of six federally threatened species may occur within the vicinity of Fort Calhoun. Two of the six federally listed species were not discussed in PSDAR, including the northern long-eared bat (*Myotis septentrionalis*) and the prairie bush-clover (*Lespedeza leptostachya*).

**In accordance with 10 CFR 50.82(a)(4)(i) and 10 CFR 50.82(a)(6)(ii), discuss the reasons for concluding that the environmental impacts associated with site-specific decommissioning activities will be bounded by appropriate previously issued environmental impact statements for the northern long-eared bat and the prairie bush-clover.**

Question 2: Federally and State-listed Species Analysis of Impacts

As noted above, the Decommissioning GEIS states that a site-specific analysis is required to determine impacts to federally and State-listed species. Section 5.1.7, "Threatened and Endangered Species," of OPPD's PSDAR provides a site-specific analysis of potential impacts to federally listed terrestrial species, including potential direct impacts during dismantling activities. However, the PSDAR does not discuss the potential impacts associated with noise from dismantling facilities and bird collisions with construction equipment. Noise could disrupt nesting, foraging, or resting behaviors for birds and bats that have the potential to occur on or near Fort Calhoun and could result in indirect adverse impacts. Bird and bat collisions with equipment could result in direct impacts, such as bird mortality or injury, if they were to occur.

**Discuss the potential impacts from noise and bird collisions to threatened and endangered species not addressed in previously issued Environmental Impact Statements.**

Question 3: Environmental Justice Impact Analysis

The NRC staff has determined that the Section 5.1.13, "Environmental Justice," in the PSDAR is incomplete because it references 2000 Census data. It does not provide current information on minority and low-income populations living in the vicinity of Fort Calhoun, and concludes the impacts of decommissioning on environmental justice are small and bounded by the Decommissioning GEIS – when the GEIS says "the impacts must be determined on a site-specific basis."

Potential environmental justice impacts from decommissioning activities, the Decommissioning GEIS (Section 4.3.13.4, "Conclusions," page 4-65) states, "the staff has concluded that the adverse impacts and associated significance of the impacts must be determined on a site-specific basis.... Subsequent to the submittal of the PSDAR, the NRC staff will consider the impacts related to environmental justice from decommissioning activities." Section 5.1.13, "Environmental Justice," of OPPD's PSDAR provides an analysis of potential impacts to minority and low-income populations, including human health and environmental effects. However, the analysis utilizes out-of-date 2000 Census information. Demographic data from the latest 2010 Census is readily available as well as recent 2015-2016 American Community Survey (ACS) data.

The Decommissioning GEIS (Section 4.3.13.2, "Potential Impacts of Decommissioning Activities on Environmental Justice," page 4-64) also states, "decommissioning activities that may affect environmental justice are related to organizational or staffing changes and offsite transportation issues.... Any decommissioning activity that results in a disproportionate share of the negative environmental consequences to minority or low-income groups has the potential to be an adverse environmental justice impact." The GEIS goes on to state, "Detectability and destabilization, as they relate to environmental justice, must be defined in proportion to the minority and low-income populations that reside in the area of the power plant. Proportionment must be determined at each site at the time of decommissioning." The OPPD analysis in the PSDAR does not address proportionment at the time of decommissioning and is silent on the potential impacts of dismantlement and decontamination activities on minority and low-income populations living near Fort Calhoun.

**In accordance with 10 CFR 50.82(a)(4)(i) and 10 CFR 50.82(a)(6)(ii), discuss the reasons for concluding that the environmental justice impacts associated with site-specific decommissioning activities will (or will not) be bounded by appropriate previously issued environmental impact statements. In addition, provide a more up-to-date environmental justice impact analysis using 2010 Census or recent ACS data and address the site-specific human health and environmental effects from dismantlement and decontamination activities, including offsite transportation issues associated with the delivery of dismantlement equipment and the removal of waste material, on minority and low-income populations living near Fort Calhoun.**

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 – REQUEST FOR ADDITIONAL INFORMATION REGARDING POST-SHUTDOWN DECOMMISSIONING ACTIVITIES REPORT (CAC NO. MF9536) DATED OCTOBER 5, 2017

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**ADAMS Accession No. ML17193A263**

**\*via email**

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