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10 CFR 2.202
10 CFR 72.4

LIC-19-0003
February 28, 2019

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555-0001

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

Fort Calhoun Station
Independent Spent Fuel Storage Installation
NRC Docket No. 72-054

Subject: Revised Response to Orders for Interim Safeguards and Security Compensatory Measures and Implementation of Additional Security Measures Associated with Access Authorization for Fort Calhoun Station dated 9 November, 2004 and Relaxation Request

References:

1. Letter from USNRC (M. V. Federline) to OPPD (R. T. Ridenoure) "Issuance of Orders for Interim Safeguards and Security Compensatory Measures and for Implementation of Additional Security Measures Associated with Access Authorization for Fort Calhoun Station", dated November 9, 2004, (NRC-04-0135)(ML042810206, ML042810218)
2. OPPD Letter (M. Tesar) to USNRC (Document Control Desk) "Answer and Response to Orders for Interim Safeguards and Security Compensatory Measures and for Implementation of Additional Security Measures Associates with Access Authorization for Fort Calhoun Station", dated November 24, 2004 (LIC-04-0127)(ML043290330)
3. OPPD Letter (M. Tesar) to USNRC (Document Control Desk) "Confirmation of Implementation of November 9, 2004, Orders for Interim Safeguards and Security Compensatory Measures and for Implementation of Additional Security Measures Associated with Access Authorization for Fort Calhoun Station", dated July 20, 2006 (LIC-06-0019) (ML62010399)
4. 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)

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On November 9, 2004, the Nuclear Regulatory Commission (NRC) issued an Order (EA-04-185 and EA-04-187) "Issuance of Orders for Interim Safeguards and Security Compensatory Measures and For Implementation of Additional Security Measures Associated with Access Authorization for Fort Calhoun Station," (the Order) (Reference 1). The Order modified the license for the Fort Calhoun Station (FCS) Independent Spent Fuel Storage Installation (ISFSI) to require compliance with Interim safeguards and security compensatory measure (ICMs) and additional security measures (ASMs) related to access authorization. By letter dated November 24, 2004 (LIC-04-0127) (Reference 2) Omaha Public Power District (OPPD) consented to the Order and submitted its confirmation of implementation to the Orders by letter dated July 20, 2006 (LIC-06-0019) (Reference 3).

OPPD submitted certification of permanent removal of the fuel from the reactor vessel to the NRC on November 13, 2016 (LIC-16-0074) (Reference 4). Pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. As part of the ongoing decommissioning process, OPPD intends to move the spent fuel in the spent fuel pool to the ISFSI.

In accordance with Section IV of the Order and 10 CFR 2.202, OPPD hereby submits its response to the Order for an ISFSI using dry storage that is not co-located with an operating power reactor facility. Attachment 1 provides a response to each of the items stated in Section B of Attachment 1 to the Order and provides an implementation schedule for each item. Attachment 2 provides a response to the ASMs for access authorization and fingerprinting implementation schedule. OPPD had previously consented to the Order in the November 24, 2004 letter (LIC-04-0127).

Fort Calhoun is currently in compliance and will remain in compliance when the Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0 (the Plan) that reflects an "ISFSI only" site configuration is implemented. The Plan is being submitted with this request. OPPD requests review and approval of the proposed license amendment by January 31, 2020. Once approved, the Amendment will be implemented within ninety (90) days of OPPD's submittal of a written certification to the NRC of all fuel being transferred to the ISFSI.

The enclosed compact disk (CD) contains Safeguards Information and must be controlled in accordance with 10 CFR 73.21.

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If you should have any questions regarding this transmittal, please contact Mr. Bradley H. Blome at 402-533-6041. There are no regulatory commitments contained in this letter.

Respectfully,



Mary J. Fisher
Vice President- Energy Production and Nuclear Decommissioning

MJF/cac

- c: Director, Office of Nuclear Materials Safety and Safeguards
- S. A. Morris, NRC Regional Administrator, Region IV (Without Enclosure)
- J. D. Parrott, NRC Senior Project Manager (Without Enclosure)
- C. D. Steely, NRC Senior Health Physicist, Region IV (Without Enclosure)

Enclosure: Compact Disk (Safeguards Information)

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