

Omaha Public Power District

1623 HARNEY ■ OMAHA, NEBRASKA 68102 ■ TELEPHONE 536-4000 AREA CODE 402

December 7, 1982

LIC-82-385

Mr. Darrell G. Eisenhut, Director
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Eisenhut:

Fort Calhoun Station Safeguards Contingency Program

Generic Letter 82-23 dated October 30, 1982 identified an apparent inconsistency between the requirements of 10 CFR 73.40(d) and the Standard Technical Specifications (STS) regarding independent reviews of Safeguards Contingency Programs. The District has reviewed the requirements of 10 CFR 73.40(d) and has verified the proper controls are presently in place to ensure an annual review of the Fort Calhoun Station program is conducted in accordance with the subject Code of Federal Regulations section. As stated in Chapter 14, "Security Audits", of the Fort Calhoun Station Site Security Plan, Corporate Quality Assurance is responsible for conducting an annual audit and review of the plant's security program. This audit encompasses those items specifically identified in 10 CFR 73.40(d) which require review.

The Combustion Engineering STS detail that under the cognizance of a plant's independent offsite review committee, the security plan and implementing procedures shall be audited at least once per 24 months. Fort Calhoun Station Technical Specification Section 5.5.2.8(f) requires our Safety Audit and Review Committee to oversee the completion of such an audit of the Site Security Plan and associated implementing procedures once every two years.

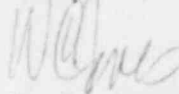
As discussed above, the District presently conducts the necessary reviews and audits of our security program as defined in both 10 CFR 73.40(d) and the STS. The District believes no Technical Specification

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(TS) changes are necessary since the required audit controls are presently in place. Additionally, the regulations require the District to maintain and comply with an approved Safeguards Contingency Plan (i.e., our Site Security Plan) and, since an annual review and audit of the security program is stipulated in the plan, the District is required to conduct an annual review even though this frequency is not specifically identified in our TS's.

Sincerely,



W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036