Omaha Public Power District

10 CFR 50.71(e)
10 CFR 50.4(b)(6)
10 CFR 50.54(a)
10 CFR 50.59
10 CFR 54.37(b)
10 CFR 71.106
10 CFR 72.48(d)(2)

March 10, 2022
LIC-22-0002

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

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

Omaha Public Power District - Fort Calhoun
Quality Assurance Program Approval for Radioactive Material Packages
NRC Docket No. 71-0256

Subject: 10 CFR 50.59 Report, Quality Assurance (QA) Program Changes, Technical Specification Basis Changes, 10 CFR 71.106 Quality Assurance Program Approval, Aging Management Review, Commitment Revisions, and Revision of Updated Safety Analysis Report (USAR) to the Decommissioning Safety Analysis Report (DSAR) for Fort Calhoun Station (FCS), Unit No. 1

Reference: 1. Letter from OPPD (M. J. Fisher) to NRC (Document Control Desk), 10 CFR 50.59 Report, Quality Assurance (QA) Program Changes, Technical Specification Basis Changes, 10 CFR 71.106 Quality Assurance Program Approval, Aging Management Review, Commitment Revisions, and Revision of Updated Safety Analysis Report Revision for Fort Calhoun Station (FCS), Unit No. 1, dated April 30, 2020 (LIC-20-0005)

In accordance with 10 CFR 50.59(d)(2), the Omaha Public Power District (OPPD) submits Attachment 1 as the report of changes, tests, and experiments performed pursuant to 10 CFR 50.59 for Fort Calhoun Station (FCS), Unit No. 1. Attachment 2 is provided to describe Quality Assurance (QA) Program changes as required by 10 CFR 50.54(a)(4)(i). Attachment 3 describes changes made to the quality assurance program approval for radioactive material packages. Attachment 4 contains a description of revised regulatory commitments that require Commission notification in accordance with NEI 99-04, "Guidelines for Managing NRC Commitment Changes." In accordance with FCS Technical Specification Amendment 299, dated December 11, 2019 (ML16275A323), the FCS License no longer contains any Technical Specification (TS) Basis. Since there are no longer any remaining Basis, this amendment also removed the TS Section 5.20 requirement to maintain the program. Attachment 6 provides a brief summary of the Technical Specification Basis Changes (TSBCs) made since the previous submittal (Reference 1) and Attachment 8 provides a list of files on CD-ROM included in this submittal.

In accordance with 10 CFR 54.37(b), a review of structures, systems, and components (SSCs) newly identified that would have been subject to an aging management review or evaluation of time-limited aging analysis in accordance with 10 CFR 54.21 was performed. No new SSCs subject to an aging management review or evaluation of time-limited aging analyses in accordance with 10 CFR 54.21 were identified.

In accordance with10 CFR 72.48(d)(2) the Omaha Public Power District (OPPD) is submitting the summary report of changes, tests and experiments for the FCS Independent Spent Fuel Storage Installation (ISFSI) subject to evaluation in accordance with 10 CFR 72.48(c)(2). There was one changes, tests, or experiments that required an evaluation to be performed under 10 CFR 72.48. See Attachment 7.

This information covers the period of February 29, 2020 through February 28, 2022.

The DSAR is issued in electronic format. Pursuant to 10 CFR 50.71(e) and 10 CFR 50.4(b)(6), enclosed is one (1) original CD-ROM of the FCS DSAR made since the previous submittal (Reference 1) and includes changes made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission. Attachment 8 contains a list of the files on the CD-ROM.

As required by 10 CFR 50.71(e)(2)(i), I certify, through the work performed by qualifed personnel, that the information in this submittal accurately presents changes made since the previous submittal, necessary to reflect information and analyses submitted to the Commission or prepared pursuant to Commission requirements, and identifies changes made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.

No commitments to the NRC are made in this letter.

If you should have any questions, please contact Mrs. Andrea K. Barker – Regulatory Assurance and Emergency Planning Manager at (531) 226-6051.

Respectfully,

DocuSigned by:
Troy Via
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Troy R. Via
Chief Operating Officer and Vice President Utility Operations

TRV/cac

Attachments:
1. Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59
2. Quality Assurance Program Changes
3. 10 CFR 71.106, Quality Assurance Program Approval for Radioactive Material Package Changes
4. Regulatory Commitments Revised in Accordance with NEI 99-04
5. Information removed from the DSAR
6. Summary of Technical Specification Basis Changes (TSBC)
7. Changes, Tests, and Experiments Performed Pursuant to 10 CFR 72.48
8. List of Files on CD-ROM

Enclosure: CD-ROM of DSAR Sections and Figures

c: S. A. Morris, NRC Regional Administrator, Region IV
J. D. Parrott, NRC Senior Project Manager (w/o closure)
S. Anderson, NRC Health Physicist, Region IV (w/o closure)

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59

Abbreviations and Acronyms:

CD-ROM – Compact Disk Read-Only Memory	USAR – Updated Safety Analysis Report
CFR – Code of Federal Regulations	WDS – Waste Disposal System
COO - Chief Operations Officer and Vice President – Utility Operations	w/o – without
DBA – Design Basis Accident	
DBT – Design Basis Tornado	
DOC – Decommissioning Oversite Committee	
DSAR - Decommissioning Safety Analysis Report	
EC – Engineering Change	
FCS – Fort Calhoun Station, Unit No. 1	
FSAR – Final Safety Analysis Report	
HSM – Horizontal Storage Module	
IMA - Independent Management Assessment	
IOEP - ISFSI Only Emergency Plan	
IOF - ISFSI Operating Facility	
IOTS – ISFSI Only Technical Specifications	
ISFSI – Independent Spent Fuel Storage Installation	
ITS - important to safety	
NEI – Nuclear Energy Institute	
NRC – Nuclear Regulatory Commission	
ODCM - Off-Site Dose Calculation Manual	
OPPD – Omaha Public Power District	
PCP – Process Control Program	
PDEP - Permanently Defueled Emergency Plan	
PDTS – Permanently Defueled Technical Specifications	
PORC – Plant Operations Review Committee	
QA – Quality Assurance	
QATR - Quality Assurance Topical Report	
RW – Radioactive Waste	
SCR – Safety Review Committee (PORC)	
SSC – Structures, Systems and Components	
TS – Technical Specification	
TSBC – Technical Specification Basis Change	
UFSAR – ISFSI Updated Final Safety Analysis Report	

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59

2020 Evaluations

Note - The 10 CFR 50.59 evaluations summarized below are, for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	50.59 Evaluation Summary
EC 70536	Auxiliary Building Deconstruction Ventilation	Description of Activity: Auxiliary Building Radioactive Exhaust Fans VA-40A and VA-40B and Auxiliary Building Supply Air Unit VA-35A will be used to provide Auxiliary Building ventilation requirements for deconstruction. This EC installs Deconstruction Power Panel D2B5 with a rating of 400 amps. This panel will contain breakers that will provide manual control of exhaust fans VA-40A and VA-40B. Another breaker will be installed to supply power to Supply Fan VA-35 Control Panel, AI-284A. VA-35A will be manually operated at full speed and interlocked with the exhaust fans to prevent operation unless an exhaust fan is operating. All of the existing interlocks associated with these fans are being removed. All control room indications, controls, and annunciation will be disabled. Existing ductwork will be used for supply and exhaust air. All dampers will either be back draft dampers or manually adjusted. All control room indications, controls, and annunciation will be disabled. Stack Radiation Monitor Local Rate Meter (RM-052-1, located on AI-81) will be isolated from the Stack Radiation Monitor Remote Rate Meter (RM-052, located in the Control Room). It will be operated in the local mode of operation. AI-81 will be isolated from existing sources of power and annunciation and repowered from Deconstruction Power Panel board D2B5 being installed under this EC. Local heating will be arranged to maintain temperature of AI-81 equipment above 40F during the heating season. All control room indications, controls, and annunciation will be disabled. Heat Tracing Control Panel AI-169 will be repowered to maintain heat tracing on RM-052-1 sample lines. The temperature monitoring function will be maintained for Radiation Monitor RM-052-1 (TE-045-3 and TE-045-4). The other remaining

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59

2020 Evaluations

Note - The 10 CFR 50.59 evaluations summarized below are, for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	50.59 Evaluation Summary
		heat tracing and temperature monitoring will not be reconnected. Control Room annunciation will be disabled. Supply Fan Panel AI-284A Auxiliary Panel, AI-284A-1, containing Auxiliary Building Temperature Controller, BC-201, will be abandoned in place and disconnected from AI-284A. This unit is one of a redundant pair of controllers used to provide temperature and pressure control of the Auxiliary Building. Reason for Activity: FCS is commencing deconstruction and demolition activities of the facility in the near future. A prerequisite is the de-energization of the existing electrical equipment within the various buildings. This includes de-energization and abandonment of the 161kV and 345 kV systems. All required electrical power will need to be supplied by the 13.8 kV system. Auxiliary Building ventilation and stack radiation monitoring requirements will need to be resupplied from Deconstruction Power. Effect of Activity: There is no impact to safety analyses or ISFSI operation as a result of this activity. Deconstruction Power is not a DSAR described SSC. Deconstruction Power is designed to provide temporary power for deconstruction and demolition activities associated with the FCS power block. The system is designed to maintain temperature in the range of 40°F to 110°F based upon outside ambient air temperature of -11°F in winter and 95°F in summer. Supply air is conditioned using heating equipment in the winter months to

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59

2020 Evaluations

Note - The 10 CFR 50.59 evaluations summarized below are, for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	50.59 Evaluation Summary
		maintain the 40°F minimum temperature. The temperature limits are required for radiation monitors credited in the Off-Site Dose Calculation Manual (ODCM). This EC affects the controlled access area of the Auxiliary Building. This EC disables the conditioning (heating) of the supply air. Local manual heating will be used in the vicinity of AI-81, RM-052 Radiation Monitoring Skid, to maintain the temperature within the range required by the radiation monitor credited in the ODCM in the affected space. Pneumatically operated dampers that are controlled either manually or automatically will be manually operated without pneumatics. "The supply/exhaust duct work distribution system was designed and balanced so that the zones of highest potential radioactive contamination are at a negative pressure, relative to adjacent areas, in order to prevent outflow of air. Automatic controls provide overall Auxiliary Building negative pressure control relative to the atmosphere, by adjusting the speed of the supply fans. Under abnormal conditions, the overall negative pressure is maintained by the alignment of the supply/exhaust fans which are manually started and stopped in the Control Room" (DSAR 9.10.2.1). Automatic control of building pressure will be eliminated, pressure control will be performed manually. Supply Fan VA-35A operated at full speed along with two exhaust fans will provide manual control of negative building pressure. "The auxiliary building systems have multiple fans so that in the event of fan failure, the systems can still function but at reduced capacity" (DSAR 9.10.6). Only one supply fan and two exhaust fans are being connected to Deconstruction Power. One supply fan and one exhaust fan will be left installed as unconnected spares.

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59

2020 Evaluations

Note - The 10 CFR 50.59 evaluations summarized below are, for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	50.59 Evaluation Summary
		DSAR 7.6.1 states that "[t]he auxiliary building area ventilation air temperatures are controlled at local panels adjacent to the air handling units." DSAR 7.6.4 further describes "[t]emperature control panels for the auxiliary building ventilation systems: [t]he panels contain controllers only; thermostats are located elsewhere." Automatic temperature control of the controlled access area of the Auxiliary Building is being eliminated. Radiation Monitoring is discussed in DSAR 11.2. "Permanently installed and temporary radiation monitors are provided for radiological controls and ODCM requirements." "A combination of permanent and temporary radiation area monitors is provided to protect plant personnel in the Auxiliary Building, and Radioactive Waste Processing Building." Process radiation monitors are not specifically mentioned in the DSAR. The radiation monitor credited in the ODCM affected by this EC is RM-052 sampler located in AI-81. The function of the RM-052 Sampler will be maintained by this EC. The ODCM is not affected by this EC. The 50.59 screen identified two areas that were considered adverse. The first was in the area of changing automatic controls to manual controls. This change is applicable to Auxiliary Building pressure control (including manual control of Supply Fan VA-35A speed), inlet and outlet dampers for Auxiliary Building Radioactive Exhaust Fans VA-40A and VA-40B and inlet damper for Auxiliary Building Supply Air Unit VA-35A, and temperature control in the vicinity of RM-052 Radiation Monitoring Skid (AI-81). The second area is the elimination of Control Room annunciation for the Stack Radiation Monitor Local Rate Meter (RM-052-1, located on RM-052 Radiation Monitoring Skid, AI-81).

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59

2020 Evaluations

Note - The 10 CFR 50.59 evaluations summarized below are, for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	50.59 Evaluation Summary
		A 50.59 Evaluation was performed to determine the impact of the adverse effects identified in the 50.59 Screen. The evaluation concluded that there is less than a minimal increase in radiological consequences as a result of the adverse effects identified during the screening process. EC 70536, Auxiliary Building deconstruction Ventilation, may be implemented without prior authorization from the NRC. DSAR sections 1-02, 7-06, and 9-10 require revision as a result of the changes being implemented by the engineering change. Summary of Conclusion for the Activity's 50.59 Review: The effect of the Fire Protection Program were reviewed in accordance with the requirements of 10 CFR 50.48(f). This review is documented on forms FCSI-RA-106-F-02 (Fire Protection Review) and CC-FC-209 Attachment 1 (Approved Fire Protection Program Configuration Change Impact Review). The conclusion of this review was there is no impact on the Fire Protection Program as a result of the implementation of EC 70536.

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 50.59

2021 Evaluations

Note - The 10 CFR 50.59 evaluations summarized below are for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	50.59 Evaluation Summary
		No 50.59 Evaluations performed.

2022 Evaluations

Note - The 10 CFR 50.59 evaluations summarized below are for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	50.59 Evaluation Summary
		No 50.59 Evaluations performed as of 02-28-2022

Quality Assurance Program Changes

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

And

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

QA Program Change Number [Date of Change]	The Quality Assurance Topical Report (QATR) Revision Description
Revision 13 / 06/01/2020	• Relocation of PDTS Section 5.1.1, Responsibility. These requirements were previous located in the QATR. • Relocation of PDTS Section 5.2.1, Organization, in its entirety to the QATR. Portions of these requirements were previously located in the QATR, other requirements from this section is added to the QATR. • Relocation of PDTS Section 5.3.1, Facility Staff Qualification. The content will be revised to remove the certified fuel handler requirements and change specific qualification exceptions, and relocate it to the QATR. • Relocation of PDTS Section 5.4.1, Training. The content is relocated, in its entirety, to the QATR. • Relocation of PDTS Section 5.8.1(d), Programs. The content is relocated, in its entirety, to the QATR. The QATR requirements associated with Regulatory Guide 1.33 and associated procedure requirements is deleted. • Relocation of PDTS Section 5.9, Reporting Requirements. The content is relocated, in its entirety, to the QATR. • Relocation of PDTS Section 5.10, Records Retention. These requirements were previous located in the QATR. • Relocation of PDTS Section 5.16.1. Radiological Effluent and Environmental Monitoring Program. The content is revised to remove the reference to a deleted PDTS Section and noble gas requirements, and relocated to the QATR. • Relocation of PDTS Section 5.16.2, Radiological Effluent and Environmental Monitoring Program. The content is relocated, in its entirety, to the QATR. • Relocation of PDTS Section 5.17, Offsite Dose Calculation Manual (ODCM). The content is revised to remove the reference to temporary changes, and relocate it to the QATR. Global changes to the QATR removes information no longer germane to an ISFSI only facility.

Revision 14 / 06/01/2020	• DQAP has transitioned to apply to only important to safety (ITS) structures, systems and components (SSCs) and associated activities. • Organizational discussion has been streamlined to provide more generic organizational position titles rather than being position specific. • Discussion regarding the Security Plan, Emergency Plan, and the Fire Protection Program has been deleted. • All sections rewritten or edited using similar language that has been previously approved by the NRC for other nuclear facilities that have transferred all of the spent nuclear fuel to the ISFSI. • Appendix A "Organization Chart" has been added with a simplified chart to be a generic organizational chart that defines functional relationships, authorities and responsibilities. • A new Appendix B has been developed to list some key ITS SSCs in a high level summary. • Appendices for "List of Acronyms", "Definitions", and "References" have been deleted. • Any discussion around the Decommissioning Oversight Committee (DOC) has been replaced with an Independent Management Assessment (IMA) function and was moved to the new Appendix D. • The Safety Review Committee (SRC) previously described has been replaced with the Independent Safety Review (ISR) function and was moved to the new Appendix D. • Appendix D has been modified to integrate the administrative controls previously relocated from the Technical Specifications into a single group of requirements. • The Appendix D discussion regarding ANSI N18.1-1971 has been modified to focus more specifically on being applicable to spent fuel safety and radiation protection personnel, including those individuals that will be performing the final status survey activities.
Revision 15 / 07/27/2020	• Extends internal and vendor audit allowance to 25% grace allowance.
Revision 16 / 11/02/2021	• Corporate OPPD is realigning the FCS Decommissioning project under a newly created Chief Operations Officer and Vice President – Utility Operations (COO). The Nuclear Oversight function is being moved under the Vice President, Corporate Strategy and Governance to ensure continued independence. The effective date of the realignment is 1 November 2021. • Update DSAR Appendix N reference to Appendix A due to Appendix N being deleted from the DSAR.

10 CFR 71.106
Quality Assurance Program Approval
for Radioactive Material Package Changes

QA Program Change Number [Date of change]	Revision Description
N/A	No changes have been made to the quality assurance program approval for radioactive material package changes since August 13, 2015 when NRC Form 311, Quality Assurance Program Approval for Radioactive Material Packages was approved (QA Program Approval No. 71-0256, Rev. No. 8). See NRC letter dated August 13, 2015 (NRC-15-075) (ML15231A598).

Regulatory Commitments Revised in Accordance with NEI 99-04

Regulatory Commitments Revised in Accordance with NEI 99-04

Commitment Number	Description
	No commitment revisions during this period

Information Removed from the DSAR

Information Removed from the DSAR

EC Number	Description
EC 70416	DSAR Section 1.2.2 Deleted reference to structures that support rad waste processing based on duplication of description elsewhere in the DSAR. Added turbine building and intake structure to list of legacy buildings as they no longer have any function. Added statement that polar bridge crane no longer has a function. Removed unnecessary detail and former function description. Replaced 'Rad Waste Processing Building' reference with 'station structures' as it will be more accurate after EC 70416. Deleted last paragraph based on detail elsewhere in DSAR and 'haul route' no longer relevant as all fuel is on the pad and previously removed under EC70269. DSAR Section 1.2.4: Deleted this section as shielding requirements pertaining to containment are described in 1.2.10. DSAR Section 1.2.7: Separated ISFSI and Deconstruction electrical systems. DSAR Section 1.2.8: Added RWDS to list of systems that remain installed but no longer have a function due to 'new RWD System/Equipment' EC 70416. DSAR Section 1.2.8.\: Minor edits to wording that describes GTCC canister. Deleted this paragraph as this information is more appropriate for the 72.212 Evaluation Report. Ensure 72.212 is updated with this content. Updated description more generically to apply to 'station' ventilation systems as Aux Building vent system not the only ventilation system to be operated. Also added reference that ODCM controls any airborne contaminants. DSAR Section 1.2.10 2nd paragraph is a deletion of an edited section. 3rd and 4th paragraphs removed references to 'system' per this EC and replaced with references to 'equipment' as more accurate. Also removed reference to 10 CFR 50 Appendix B, NUREG 1301, and ANSI- 18.2 as these no longer directly apply to FCS based on EA20- 003. Added reference to ODCM and deleted excessive detail about Missouri river. Per EA20- 003, these calculations can now be controlled under the ODCM. Removed extraneous detail and kept ODCM reference. Added reference to the ODCM and Process Control Program and deleted unnecessary detail in types of solid wastes and solid waste containers. Removed references to specific equipment sources of radiation but retained shielding function description. Also removed detail about shielding arrangement in the Aux Building, left general description. Added generic statement that rad material sources are controlled by RP and deleted excessive detail about potential rad sources and CFR limits. Added clarifying text about FC08566 and took conclusions from EA20- 003 that no SSC is required to maintain doses below 10 CFR 20 limits. DSAR Section 1.2.11: Removed excessive detail regarding irrelevant USAS B31.7 code and its application to various plant equipment. Reference 1- 17: Deleted ANSI- 18.2 reference based on EA20- 003 conclusion that no SSC are required for WD System or any other system to limit dose to public less than 10 CFR 20 limits. Clarified the CoC 1004 amendments are Renewed. DSAR Section 2.1: made this section 'archive text' DSAR Section 2.2 Changed site description from 'plant buildings' to industrial area as site is now a decommissioning area. Deleted excessive detail regarding vegetation samples and added an ODCM reference as these details are described there. DSAR Section 2.4.4: added this section to retain former seismic design requirements that support the ISFSI 72.212. The seismic design requirements for the part 50 license will be maintained as archived text. Transferred Response Spectra for a MHE figure from Appendix F to this chapter to support the ISFSI.

Information Removed from the DSAR

EC Number	Description
	DSAR Section 2.7.2.2: Added reference to Ground Water Protection Program in ODCM. DSAR Section 2.10.1: added reference to ODCM. DSAR Section 2.10.4: Corrected reference from 'Decommissioning Survey Program' to the correctly named 'Radiological Environmental Monitoring Program as described in the ODCM. DSAR Section 5.11: Deleted, no structures have any credited function per this activity. DSAR Section 12.6 and Section 12.7: made this section consistent with other sections of CH 12. DSAR Appendix F: deleted this appendix in its entirety due to EA20- 003 enabling removal of seismic requirements. Moved OBE and MHE that supports the ISFSI 72.212 to DSAR 2.4 "Seismology" DSAR Appendix G, Criterion 17: removed unnecessary detail while retaining necessary information. Criterion 18: added a reference to RP Protection Program. Criterion 68: changed 'system' to equipment since many RW disposal means will not involve installed plant equipment. Also removed unnecessary detail. Criterion 69: updated description to present site configuration. Removed code compliant systems as the station no longer has code requirements for DSAR described radioactive waste SSCs and added the ODCM and PCP for controlling releases per the result of EA20- 003. Criterion 70: deleted redundant reference to 10 CFR 20 limits and deleted reference to FC08566 which is now located in 1.2.10.H. Documented no SSCs are relied on to maintain levels below 10 CFR 20 limits per EA20- 003. Note: All DSAR figures related to deleted sections described above and deleted in prior DSAR changes will be set to History in Asset Suite.
EC 70558	The following DSAR sections were deleted: DSAR-5.12, SPECIFIC REFERENCES; DSAR-7.6, OPERATING CONTROL STATIONS; DSAR-8.1, INTRODUCTION; DSAR-8.2, NETWORK INTERCONNECTIONS; DSAR-8.3, STATION DISTRIBUTION; DSAR-8.4, EMERGENCY POWER SOURCES; DSAR-8.5, INITIAL CABLE INSTALLATION DESIGN CRITERIA; DSAR-8.6, GENERAL REFERENCES; DSAR-8.7, SPECIAL REFERENCES; DSAR-9.1, GENERAL; DSAR-9.10, HEATING, VENTILATING AND AIR CONDITIONING SYSTEM; DSAR-9.12, COMPRESSED AIR SYSTEM; DSAR-9.8, RAW WATER SYSTEM; DSAR-11.4, SPECIFIC REFERENCES; DSAR-11.5, GENERAL REFERENCES DSAR-1.2, SUMMARY PLANT DESCRIPTION: Excessive detail was removed from Plant Site (1.2.1) and Station Arrangement (1.2.2). Removed reference to Emergency Diesel Generators from 1.2.2 paragraph 6 as they are no longer on site. Auxiliary System descriptions were deleted for the following systems: Chemical Volume Control, Shutdown Cooling, Component Cooling Water, Raw Water, Sampling, Circulating Water, Turbine Plant Cooling Water, Auxiliary Steam, and Compressed Air. Excessive detail including descriptions of 161kV, 4.16kV, 125 VDC, 120 VAC Electrical Systems (1.2.7) was removed, noted power is supplied by existing and temporary power systems. Added a statement to Plant Ventilation Systems (1.2.8.7) to state that offsite concentrations and in-plant doses will be maintained within 10 CFR 20 limits. Correction added to clarify that TN RWCs will be stored inside 1 HSM vs 3 tuna cans. The 'tuna cans' maybe inside a RWC, but the qualified canister will be a TN RWC, specifically designed for storage inside a HSM. Reference TN Specification RWC-WA-0101 under OPPD Contract 235959. (1.2.8.4). Added a reference to Radioactive Waste Disposal (1.2.10) stating ANSI-18.2 requirements will be met. Added descriptions, text, and references to the ODCM to

Information Removed from the DSAR

EC Number	Description
	1.2.10.1/2/3/4/5/6, respectively to enable deletion of DSAR-11.1/11.2/11.3 and DSAR-2.10. Added 1.2.11 to clarify plant design codes and to state "no longer any safety class components at the station." DSAR-1.11, SPECIFIC REFERENCES: Added a reference to ANSI-N18.2 DSAR-2.7, HYDROLOGY: Removed excessive detail. Added table of flood elevations and historical probabilities. Removed High Water Level discussion. Removed descriptions of design basis flood levels. Removed river temperature discussion as no longer utilized for cooling. DSAR-2.10, ENVIRONMENTAL RADIATION MONITORING: This section was updated to remove duplicate information contained in the ODCM. DSAR-2.11, SECTION 2 REFERENCES: Deleted references 12, 13, 17, 18, 20, 21, 22, 37, 38, 41 as no longer applicable. DSAR-5.11, STRUCTURES OTHER THAN CONTAINMENT: Updated this section to include Containment as prior DSAR rev evaluated Containment as a Class II structure going forward. Per EC 70326, CONTAINMENT SYSTEM ABANDONMENT AND BUILIDING DEMOLITION PREPARATION, the Containment Structure is currently correctly classified as Seismic Class II and the change from Seismic Class I to II was performed in process. The following DSAR sections were deleted due to substantial repetition of ODCM content. Moved remaining pertinent info into DSAR-1.2 per description above: DSAR-11.1, RADIOACTIVE WASTE DISPOSAL SYSTEM; DSAR-11.2, RADIATION PROTECTION AND MONITORING; DSAR-11.3, RADIOLOGICAL EFFLUENT REQUIREMENTS DSAR-12.1, ORGANIZATION AND RESPONSIBILITY: Added: "..and in site administrative procedures and organizational charts." For clarification. DSAR-12.2, TRAINING: Added: "..and in site administrative procedures" For clarification. DSAR-12.3, PROCEDURES: Added: "..and in site administrative procedures " For clarification. DSAR-12.4, RECORD: Added: "..and in site administrative procedures " For clarification. DSAR-12.5, REVIEW AUDIT OF OPERATIONS: Added: "..and in site administrative procedures and organizational charts." For clarification. DSAR-12.6, SITE EMERGENCY PLAN: Updated section to reference the current ISFSI Only Emergency Plan (IOEP). The following DSAR sections were deleted Per Certification of Empty SFP (LIC-20-012) and License Amendment (LIC-18-0003): "As discussed in this submittal, the remaining design basis accidents (DBA) and transients associated with fuel analyzed in Chapter 14 of the FCS Defueled Safety Analysis Report (DSAR) are no longer applicable for the condition where all spent nuclear fuel is transferred to dry cask storage within an ISFSI." DSAR-14.1, GENERAL; DSAR-14.20, WASTE LIQUID INCIDENT

Information Removed from the DSAR

EC Number	Description
	DSAR-APPENDIX F, CLASSIFICATION OF STRUCTURES AND EQUIPMENT AND SEISMIC CRITERIA: Statements were added that no Seismic Class I SSCs remain and that all remaining functional structures are Class II, some with seismic requirements (WDS system basins). Added statement that ISFSI Basemat is designed for the Design Basis Earthquake. 2.3 Plant Seismic Instrumentation was deleted. Added Rad Waste Building Seismic basin qualification reference (FC03561). DSAR-APPENDIX G, RESPONSES TO 70 CRITERIA: No criteria was deleted during this change. Minor wording changes and updates were made. DSAR-APPENDIX N, RECLASSIFICATION OF SYSTEMS: This section was deleted. The ANSI standard reference will be added to section 1.2 for the Radioactive Waste Disposal System. Note: All DSAR figures related to deleted sections described above and deleted in prior DSAR changes will be set to History in Asset Suite.
EC 70269	This following DSAR sections were deleted in their entirety: DSAR-3.7 NUCLEAR FUEL MECHANICAL DESIGN AND INFORMATION; DSAR-3.10 NUCLEAR FUEL GENERAL REFERENCES; DSAR-5.7 PILING; DSAR-5.13 GENERAL REFERENCES; DSAR-7.1 INTRODUCTION; DSAR-7.5 INSTRUMENTATION SYSTEMS; DSAR-7.7 GENERAL REFERENCES; DSAR-8.4 EMERGENCY POWER SOURCES; DSAR-8.5 INITIAL CABLE INSTALLATION DESIGN CRITERIA; DSAR-8.6 GENERAL REFERENCES; DSAR-8.7 SPECIAL REFERENCES; DSAR-9.5 FUEL HANDLING SYSTEM; DSAR-9.6 SPENT FUEL POOL COOLING SYSTEM; DSAR-9.7 COMPONENT COOLING WATER SYSTEM; DSAR-9.9 TURBINE PLANT COOLING WATER SYSTEM; DSAR-9.11 AUXILIARY SYSTEMS - FIRE PROTECTION SYSTEM; DSAR-12.5 REVIEW AUDIT OF OPERATIONS; DSAR-14.18 FUEL HANDLING ACCIDENT (IN SPENT FUEL POOL AND CONTAINMENT); DSAR-14.24 HEAVY LOAD INCIDENT; DSAR-15.1 LICENSE RENEWAL SUPPLEMENT INTRODUCTION; DSAR-15.2 PROGRAMS AND ACTIVITIES FOR MANAGING THE EFFECTS OF AGING; DSAR-15.4 LICENSE RENEWAL SUPPLEMENT LICENSE RENEWAL COMMITMENT LISTING DSAR-1.1 INTRODUCTION This section was updated with two paragraphs describing present regulatory status of FCS based on permanent removal of spent fuel from the spent fuel pool to dry storage in the Independent Spent Fuel Storage Installation (ISFSI). DSAR-1.2 SUMMARY PLANT DESCRIPTION "This section was updated to remove excessive detail and detail that no longer applies to the facility. This update includes additional new description of the ISFSI Operating Facility (IOF), other structures supporting radioactive waste processing, and paragraph summarizing Fire Protection requirements going forward after all fuel is on the pad. Much of the previous general description is retained however, the addition of the phrase '... no longer has a design function"" has been added throughout this section and others to avoid confusion during upcoming abandonment and demolition activities at the site. DSAR-1.11 SPECIFIC REFERENCES "This section was updated to add a licensing reference to the NRC SER allowing FCS to change TS to ""… Align to Those Requirements for Permanent Removal of Spent Fuel from Spent Fuel Pool DSAR-2.1 INTRODUCTION "This section was updated to change wording to reflect 'decommissioning operations' instead of 'normal plant operations'

Information Removed from the DSAR

EC Number	Description
	DSAR-2.4 SEIMOLOGY this section has been archived in its entirety. DSAR-2.5 METEOROLOGY This section was updated to remove the reference to DSAR Appendix G, Criterion 2 and requirement that the facility be designed to withstand a Design Basis Tornado (DBT). Additionally, Sections describing the 'Meteorological Monitoring Program' and 'Accident Diffusion Estimates' are being deleted as they are no longer required. Tables of historical weather data were made Archived Text. DSAR-2.7 HYDROLOGY This section was marked-up to retain the local site hydrology and history, and the river level flooding design bases but remove the description of flood protection strategies. This section continues to support the 72.212 report. DSAR-2.8 DEMOGRAPHY This section was updated to remove references to the Permanently Defueled Emergency Plan (PDEP). After all fuel is on the ISFSI pad, the new ISFSI Operations Emergency Plan (IOEP) will be active and the PDEP will be retired. DSAR-2.10 ENVIRONMENTAL RADIATION MONITORING This section was updated to remove reference to Iodine-131 Air Monitoring and removed a use of the term 'inoperable'. DSAR-2.11 SECTION 2 REFERENCES This section was updated to remove references that no longer apply after issuance of the PDTS post fuel on the ISFSI pad. DSAR-5.8 MISSILE PROTECTION AND PIPE WHIPPING RESTRAINTS This section was updated to reference the ISFSI where design requirements to address 'Missile Protection' are described as these requirements continue to apply to the ISFSI but not any other plant structures. DSAR-5.11 STRUCTURES OTHER THAN CONTAINMENT This section was updated to delete Seismic Class I structure descriptions. Seismic Class I design requirements will be retained in DSAR Appendix F as it supports ISFSI UFSAR. Class II requirements were retained in DSAR-5.11 as they support building(s) which continue to house the Waste Disposal System. DSAR-5.12 SPECIFIC REFERENCES This section was updated to reflect changes made to sections 5.7, 5.8, 5.11. DSAR-7.6 OPERATING CONTROL STATIONS This section was updated to delete descriptions of control systems no longer used. DSAR-8.1 INTRODUCTION This section was updated to delete all but 161 kV, 4.16 kV, and instrument bus descriptions. The term Waste Disposal System was added to the general description. DSAR-8.2 NETWORK INTERCONNECTIONS This section was updated to reflect current electrical distribution network connections. DSAR-8.3 STATION DISTRIBUTION This section was updated to remove description of the Diesel Generators and other plant distribution system buses and components no longer use. Waste Disposal system was added to 'Design Bases' section. DSAR-9.1 GENERAL This section was updated to delete references to other deleted system descriptions. 'Waste Disposal System' reference was added into the general section DSAR-9.8 RAW WATER SYSTEM This section was updated to delete all description of functions no longer served by RW such as cooling. Description of RW to be used as diluent for Waste Disposal system was added. DSAR-9.10 HEATING, VENTILATING AND AIR CONDITIONING SYSTEM This section was updated to retain only ventilation system description that supports the waste disposal and waste processing functions.

Information Removed from the DSAR

EC Number	Description
	DSAR-9.12 COMPRESSED AIR SYSTEM Updated to include description of CA-18A/B and all compressed air functions as various components in the WD system still rely on compressed air. DSAR-11.1 RADIOACTIVE WASTE DISPOSAL SYSTEM and DSAR-11.2 RADIATION PROTECTION AND MONITORING These sections were updated to support Waste Disposal System requirements that remain in place. DSAR-11.3 RADIOLOGICAL EFFLUENT REQUIREMENTS This section was updated to delete requirements no longer relevant and to reference the requirements going forward in the ODCM and QATR. DSAR-11.4 SPECIFIC REFERENCES and DSAR-11.5 GENERAL REFERENCES These sections were updated to delete references that no longer apply and to add references that will apply going forward. DSAR-12.1 ORGANIZATION AND RESPONSIBILITY, DSAR-12.2 TRAINING, DSAR-12.3 PROCEDURES and DSAR-12.4 RECORDS These sections were updated to reference the QATR for related information going forward. DSAR-14.1 GENERAL This section was updated to reflect the deletion of 14.18 and the update of 14.20. DSAR-14.20 WASTE LIQUID INCIDENT This section was retained to support the continued description of the Waste Disposal system elsewhere in the DSAR. DSAR-APPENDIX G, RESPONSES TO 70 CRITERIA This section was updated to reflect general design criteria that pertain ISFSI-only facility. DSAR-APPENDIX N, RECLASSIFICATION OF SYSTEMS This section was updated to reflect classification of Waste Disposal System and systems that support WDS. Note: All DSAR figures related to deleted sections described above and deleted in prior DSAR changes will be set to History in Asset Suite

Summary of Technical Specification Basis Changes (TSBC)

TSBC No. TS Page(s) [Date]	Description
	With the submission of Amendment 299 (FCS Submission – (ML 16275A323) LIC-18-0003 and NRC issuance NRC-19-026 (ML 19297D677)), dated December 11, 2019, all Technical Specifications Basis and the requirement to maintain them, have been removed.

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 72.48

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 72.48

2022 Evaluations

Note - The 10 CFR72.48 evaluations summarized below are for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	72.48 Evaluation Summary
		No 72.48 Evaluations performed.

2021 Evaluations

Change Number	Activity Title	72.48 Evaluation Summary
		No 72.48 Evaluations performed.

Changes, Tests, and Experiments Performed Pursuant to 10 CFR 72.48

2022 Evaluations

Note - The 10 CFR72.48 evaluations summarized below are for the most part, unedited summaries as approved by the PORC. As a result, the language may be in future tense.

Change Number	Activity Title	72.48 Evaluation Summary
		No 72.48 Evaluations performed as of 2-28-2022.

List of Files on CD-ROM

#	File Name	Size	Sensitivity Level	Location	Folder
001	Index.pdf	KB	Publicly Available	CD-ROM	1-DSAR
002	DSAR .pdf	328 KB	Publicly Available	CD-ROM	1-DSAR
003	DSAR Figures Section-01.pdf	121 KB	Publicly Available	CD-ROM	1-DSAR
004	DSAR Figures Section-02.pdf	1,678 KB	Publicly Available	CD-ROM	1-DSAR
005	DSAR Figures Section-12.pdf	25 KB	Publicly Available	CD-ROM	1-DSAR