



444 South 16th Street Mall  
Omaha NE 68102-2247

## SAFEGUARDS INFORMATION

October 14, 2005  
LIC-05-0124

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, Maryland 20852

- Reference:
1. Docket No. 50-285
  2. Letter from Samuel L. Collins (NRC) to W. Gary Gates (OPPD) dated February 25, 2002, Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Fort Calhoun Station, Unit 1 (EA-02-026) (NRC-02-027) (ML020500228)
  3. Letter from Ross T. Ridenoure (OPPD) to Document Control Desk (NRC) dated September 3, 2002, Report of Full Compliance with the Requirements of the Interim Safeguards and Security Compensatory Measures Order (LIC-02-0093) (ML022480037)
  4. Letter from Samuel J. Collins (NRC) to John Sefick (OPPD) dated April 29, 2003, Issuance of Order Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors (EA-03-086) (NRC-03-087) (ML030740002)
  5. Letter from J. E. Dyer (NRC) to Ross T. Ridenoure (OPPD) dated February 25, 2005, NRC Staff Guidance for Use in Achieving Satisfactory Compliance With February 25, 2002, Order Section B.5.b (NRC-05-0058)
  6. Letter from Dave Bannister (OPPD) to Document Control Desk (NRC) dated May 31, 2005, Response to NRC Guidance Regarding Mitigation Strategies (LIC-05-0056) (ML051570413)
  7. Letter from Robert A. Gramm (NRC) to Dave Bannister (OPPD) dated September 14, 2005, Request for Additional Information Regarding the February 2002, Order Section B.5.b, for Fort Calhoun Station (TAC No. MC7114) (NRC-05-0118)

**SUBJECT: Response to Request for Additional Information Regarding the February 2002, Order Section B.5.b, for Fort Calhoun Station**

The NRC issued Reference 2 for Fort Calhoun Station Unit No. 1 (FCS) of the Omaha Public Power District (OPPD). Reference 2 imposed requirements on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Reference 2 required licensees to implement certain changes in physical security plans and safeguards contingency plans on an interim basis until final requirements were established. OPPD stated that implementation of the requirements for Section II.B.5.b of Reference 2 was complete in Reference 3.

**Attachment Contains Safeguards Material. Decontrolled When Separated From Attachment.**

Subsequently, the NRC issued Reference 4 and other security related Orders (collectively "Orders") for Fort Calhoun Station Unit No. 1 (FCS). In many ways, Reference 4 complemented or superseded requirements of the interim measures imposed by Reference 2.

As required by Reference 4, the plans for FCS have been implemented. Subsequently, OPPD was requested to respond to Reference 5 by May 31, 2005, and to implement appropriate enhancement to current mitigation strategies by August 31, 2005. Reference 5, Enclosure 2, *Developing Mitigating Strategies / Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order* (dated February 24, 2005) ("NRC B.5.b. Guidance"), asked OPPD to review the Areas of Consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the mitigating strategies deemed appropriate in accordance with Attachment B to that Enclosure.

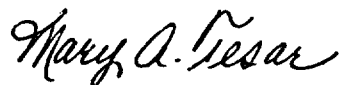
Subsequently, the Nuclear Energy Institute ("NEI"), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use ("NEI Guidance") to assist licensees in responding to Reference 5.

In response to Reference 5, OPPD submitted Reference 6. OPPD implemented the relevant items in Attachment 1 of Reference 6 by August 31, 2005.

In Reference 7, the NRC requested additional information regarding Reference 6. This submittal constitutes OPPD's response to these requests.

The responses to Items B.1.a, B.1.e and B.2.m in Attachment 1 contain information that supersedes the corresponding responses provided in Reference 6. These items were completed by August 31, 2005 (AR 36796). These actions are considered to be commitments and will be managed in accordance with OPPD's commitment tracking system. If you have additional questions, or require further information, please contact Thomas R. Byrne at (402) 533-7368.

Sincerely,



Mary A. Tesar  
Division Manager  
Nuclear Support Services

MAT/TRB/trb

Attachment 1 – Response to Request for Additional Information Regarding the February 2002, Order Section B.5.b, for Fort Calhoun Station

- c: M. F. Webb, Office of Nuclear Reactor Regulation  
J. E. Dyer, Office of Nuclear Reactor Regulation (w/o attachment)  
B. S. Mallett, NRC Regional Administrator, Region IV (w/o attachment)  
A. B. Wang, NRC Project Manager (w/o attachment)  
J. D. Hanna, NRC Senior Resident Inspector (w/o attachment)

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