

**From:** "GAMBHIR, SUDESH K" <sgambhir@oppd.com>  
**To:** <JMS3@nrc.gov>  
**Date:** 07/12/2006 11:29:12 AM  
**Subject:** Additional information for OPPD exemption request

Dear Mr. Sebrosky,

In a June 9, 2006 letter, OPPD requested an exemption to a sentence in the Bases of Technical Specification (TS) 1.2.1 for Certificate of Compliance No. 1004 listing specific dose rates. Based on discussions with the NRC, OPPD understands that, in addition to the exemption previously requested, NRC believes that an exemption is needed from the following words contained in the Bases for TS 1.2.1 :

"The radiological design criterion is that fuel stored in the NUHOMS(r) system must not increase the average calculated HSM or transfer cask surface dose rates beyond those calculated for the 24P, 24PHB, 52B, 61BT, or 32PT canister full of design basis fuel assemblies with or without BPRAs."

OPPD agrees that the optimal path forward regarding the exemption request is to acknowledge that the scope of the exemption should include the above additional sentence. Therefore, OPPD requests an exemption for the above sentence in the bases of TS 1.2.1 for Certificate of Compliance No. 1004, because the transfer cask (TC) surface dose rates will increase beyond those calculated for the 32PT design basis fuel when the OS197L TC is used for fuel-transfer operations.

Thanks,  
Sudesh Gambhir  
Division Manager - Nuclear Projects  
Fort Calhoun Station

\*\*\*\*\*

Sudesh Gambhir P.E., PMP  
(402) 533 6647 (Work), (402) 658 5934 (cell), (402) 561 3721 (Pager),  
(402) 533 6597-(Fax) -----sgambhir@oppd.com  
<mailto:sgambhir@oppd.com>

One Team -One Goal: Plan, Prepare, Practice and Perform as a Team!

This e-mail contains Omaha Public Power District's confidential and proprietary information and is for use only by the intended recipient. Unless explicitly stated otherwise, this e-mail is not a contract offer, amendment, nor acceptance. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

**CC:** "MATTHEWS, THOMAS C" <tcmatthews@oppd.com>, "ANDERSEN, STEPHEN M" <smandersen@oppd.com>, "GRUBB Bob" <bob.grubb@transnuclear.com>

**Mail Envelope Properties (44B51539.ABE : 8 : 19134)**

**Subject:** Additional information for OPPD exemption request  
**Creation Date** 07/12/2006 11:28:41 AM  
**From:** "GAMBHIR, SUDESH K" <sgambhir@oppd.com>

**Created By:** sgambhir@oppd.com

**Recipients**

nrc.gov

TWGWPO02.HQGWDO01

JMS3 (Joseph Sebrosky)

transnuclear.com

bob.grubb CC (GRUBB Bob)

oppd.com

smandersen CC (STEPHEN M ANDERSEN)

tcmatthews CC (THOMAS C MATTHEWS)

**Post Office**

TWGWPO02.HQGWDO01

**Route**

nrc.gov

transnuclear.com

oppd.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1970	07/12/2006 11:28:41 AM
TEXT.htm	4686	
Mime.822	9652	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling

This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**