



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

September 2, 2011

CAL 4-11-003

David J. Bannister, Vice President
and Chief Nuclear Officer
Omaha Public Power District
9610 Power Lane
Blair, NE 68008

SUBJECT: CONFIRMATORY ACTION LETTER - FORT CALHOUN STATION

Dear Mr. Bannister:

In your letter dated August 10, 2011, Omaha Public Power District (OPPD) submitted to the NRC the Fort Calhoun Station Post-Flooding Recovery Action Plan (ADAMS: ML112231755), and a separate non-public Security Recovery Action Plan. You also submitted Revision 1 to the Post-Flooding Recovery Action Plan on August 30, 2011 (ML112430102). These plans provide details on actions OPPD will take to assess the impact of the long term flooding at Fort Calhoun Station on plant systems, structures, and components. The purpose of this letter is to confirm the actions you plan to take as described in your submittals and identify those actions that the NRC has determined need to be reviewed or inspected prior to restart of the plant.

In early April 2011, Fort Calhoun Station commenced a scheduled refueling outage. On May 23, 2011, in response to rising water levels along the Missouri River, Fort Calhoun Station operators began implementing flood protection measures around the site to protect various safety-related structures, including the intake structure, auxiliary building, and containment. On June 6, 2011, plant personnel at Fort Calhoun Station declared a Notification of Unusual Event in anticipation that the Missouri River level at the plant would reach 1004 ft mean sea level. As a result of the flooding, Fort Calhoun Station remained in a shutdown condition. Additionally, on June 7, 2011, Fort Calhoun Station experienced a fault in an electrical bus, resulting in a fire and damage to the bus.

Following a public meeting on July 27, 2011, between NRC and OPPD personnel, OPPD issued the Fort Calhoun Station Post-Flooding Recovery Action Plan. The Plan provides for extensive reviews of plant systems, structures, and components to assess the impact of flood waters at Fort Calhoun Station. The Post-Flooding Recovery Action Plan also includes actions to identify the root cause, and implement corrective actions, for the June 7 fire, and other items important to the restart of the facility. OPPD also indicated that they will not restart Fort Calhoun Station without concurrence from the NRC that applicable commitments have been satisfied.

Based upon our review and discussions regarding your plans, we understand that OPPD commits to completing assessments and actions in six Focus Areas. These include Site Restoration, Plant Systems and Equipment, Equipment Reliability, Design and Licensing Basis, Emergency Planning, and Security. These Focus Areas are broken down into Action Plans and associated specific action items. Each plan outlines action items required to be completed prior to exceeding 210 degrees Fahrenheit (°F) in the reactor coolant system (RCS), prior to achieving reactor criticality, and longer-term recovery actions.

Based on our review of the Fort Calhoun Station Post-Flooding Recovery Action Plan and the Security Recovery Action Plan, and telephone discussions with you on September 2, 2011, it is our understanding that OPPD commits to take the following actions:

1. Inform the NRC of your schedule for completing the actions listed below to facilitate our timely inspection of the activities.
2. Prior to exceeding 210° F in the RCS, OPPD commits to complete the following actions detailed in the Post-Flooding Recovery/Security Plan: Action Items 1.2.1.1; 1.2.1.3; 1.2.1.4; 1.3.1.1 through 1.3.1.12; 1.3.1.14 through 1.3.1.19; 1.3.1.21 through 1.3.1.24; 1.4.1.2 through 1.4.1.6; 2.1.1.1 through 2.1.1.10; 2.2.1.1 through 2.2.1.32; 2.3.1.1 through 2.3.1.16; 3.1.1.1; 3.2.1.1 through 3.2.1.3; 3.3.1.1 through 3.3.1.3; 3.4.1.1; 4.1.1.12 through 4.1.1.17; 4.1.1.20 through 4.1.1.25; 4.2.1.1 through 4.2.1.6; 4.3.1.1 through 4.3.1.4; 4.5.1.1 through 4.5.1.15; 4.6.1.1 through 4.6.1.3; and 5.2.1.1.
3. Inform us in writing when you have satisfactorily completed the actions listed in 2 above.
4. Prior to reactor criticality, OPPD commits to complete the following actions detailed in the Post-Flooding Recovery/Security Plan: Action Items 3.2.2.1 through 3.2.2.4; 3.4.2.1 through 3.4.2.10; 4.2.2.1; 4.2.2.2; 4.2.2.4 through 4.2.2.7; 4.3.2.1; 5.1.2.1 through 5.1.2.8; 5.2.2.1; 5.3.2.1 through 5.3.2.7; 5.3.2.18; 5.4.2.1 through 5.4.2.4; 6.1.2.2 through 6.1.2.16; and 6.1.2.20 through 6.1.2.37.
5. Inform us in writing when you have satisfactorily completed the actions listed in 4 above.
6. Prior to reactor criticality, OPPD will meet with the NRC to ensure there is agreement the facility is ready for restart. During that meeting, we expect you will discuss the results of your assessments performed in the plan, actions you took to address any problems identified during your assessment, and your assessment of the readiness to return the plant to power operation.
7. Following restart of the plant, OPPD commits to complete the following actions detailed in the Post-Flooding Recovery/Security Plan: Action Items 1.2.3.21; 1.2.3.42; 1.2.3.57; 1.2.3.58; 1.2.3.79; 1.2.3.82; 3.4.3.1 through 3.4.3.3; 4.4.3.1 through 4.4.3.3; and 5.1.3.1.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

- (1) Notify me immediately if your understanding differs from that set forth above;
- (2) Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change; and
- (3) Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licensee; nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information) and be supported by an affidavit, if applicable. If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Please contact Jeff Clark at (817) 860-8147 if you have any questions concerning this letter.

Sincerely,



Elmo E. Collins
Regional Administrator

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Distribution via ListServ for Fort Calhoun Station