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June 8, 2012  
LIC-12-0078

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

- References:
1. Docket No. 50-285
  2. Letter from NRC (E. J. Leeds & M. R. Johnson) to OPPD (D. J. Bannister), "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ML12053A340) (NRC-12-0021)
  3. Letter from NRC (E. J. Leeds) to OPPD (D. J. Bannister), "Prioritization of Response Due Dates For Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated May 11, 2012 (ML2097A509) (NRC-12-0048)
  4. Letter from NRC (D. L. Skeen) to NEI (A. P. Heymer), "Endorsement of Nuclear Energy Institute (NEI) 12-07, *Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features*," dated May 31, 2012 (ML12144A142)

**Subject: OPPD 90-Day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendations 2.1 and 2.3 (Flooding), of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident**

On March 12, 2012, the NRC issued Reference 2 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosures 2 and 4 of Reference 2 contain specific requested actions, requested information, and required responses associated with Recommendations 2.1 and 2.3 for Flooding Evaluations and Walkdowns. This letter provides the Omaha Public Power District's (OPPD) 90-day response for Fort Calhoun Station (FCS).

### **Recommendation 2.1: Flooding**

The response date for the FCS flooding hazard reevaluation (AR 51963-10) was identified in Reference 3 as March 12, 2014, which corresponds to 2 years from the date of Reference 2. OPPD plans to comply with the requested response date and has issued a contract for the performance of the flooding hazard analysis. The vendor has provided a completion date of April 2014 and OPPD has requested that the vendor accelerate completion of the analysis to meet the March 12, 2014 response date. However, given the complexity of the analysis required for FCS, which will require extensive interaction with the government agencies operating dams within the Missouri River watershed, achievement of the March 12, 2014 response date will be challenging.

OPPD also plans to meet the requested dates for the other required responses in Enclosure 2 of Reference 2. Specifically, an approach for developing an Integrated Assessment for FCS is planned for submittal 60 days (AR 51963-08) after the NRC endorses Integrated Assessment Guidance. In addition, if necessary, an Integrated Assessment Report for FCS is planned for submittal 2 years (AR 51963-12) after the Flooding Hazard Reevaluation Report is submitted.

### **Recommendation 2.3: Flooding**

For flooding recommendation 2.3 (walkdowns), Enclosure 4 of Reference 2 states that each licensee is to confirm that it will use the NRC-endorsed flooding walkdown procedure or provide a description of the process it will use.

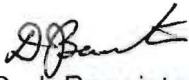
Therefore, OPPD confirms that it will use the flooding walkdown procedure (NEI 12-07, *Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features*) endorsed by Reference 4 as the basis for the flooding walkdowns at FCS. Please note that OPPD undertook a number of activities in 2011 and 2012 to solidify the FCS licensing basis for external floods, which included walkdowns of flood protection features. OPPD intends to maximize the use of this work in developing the flood protection response and may deviate from portions of the NEI guideline if previously performed activities are comparable and meet the intent of the guideline. Deviations from the NEI guideline will be documented and justified in OPPD's response.

The only regulatory commitments contained in this letter are those associated with Action Request (AR) 51963.

If you should you have questions, please contact Mr. Bill Hansher at (402) 533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 8, 2012.

Sincerely,



D. J. Bannister  
Site Vice President and CNO

DJB/JKG/mle

- c: E. J. Leeds, Director of Office of Nuclear Regulation  
E. E. Collins, Jr., NRC Regional Administrator, Region IV  
L. E. Wilkins, NRC Project Manager  
J. C. Kirkland, NRC Senior Resident Inspector