



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511

September 1, 2015

Louis P. Cortopassi, Site Vice President
Omaha Public Power District
Fort Calhoun Station
P.O. Box 550
Fort Calhoun, NE 68023-0550

Subject: MID-CYCLE ASSESSMENT LETTER FOR FORT CALHOUN STATION
(REPORT 05000285/2015005)

Dear Mr. Cortopassi:

On August 13, 2015, the Nuclear Regulatory Commission (NRC) completed its mid-cycle performance review of the Fort Calhoun Station. The NRC reviewed the most-recent quarterly performance indicators (PIs), inspection results, and enforcement actions from July 1, 2014, through June 30, 2015. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, the Fort Calhoun Station operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Fort Calhoun Station during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., Green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., Green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

By letter dated March 30, 2015, (ADAMS Accession No. ML15089A085), the NRC informed you of the transition of regulatory oversight of Fort Calhoun Station from the Inspection Manual Chapter 0350 "Oversight of Operating Reactor Facilities in an Extended Shutdown as a Result of Significant Performance Problems," process to the Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," oversight process. This transition became effective on April 1, 2015. Based on plant performance at the time, Fort Calhoun Station was placed in the Licensee Response Column of the ROP Action Matrix.

During this mid-cycle performance review, the NRC identified a cross-cutting theme in Human Performance involving Conservative Bias (H.14), with seven findings with this cross-cutting aspect identified over the twelve-month assessment period. The NRC also identified a cross-cutting theme in Problem Identification and Resolution associated with Evaluation (P.2), which also consisted of seven findings with this cross-cutting aspect identified over the twelve-month assessment period. In addition, the NRC identified overall cross-cutting themes in both the Human Performance and Problem Identification and Resolution areas, with 32 and 12 findings, respectively, with cross-cutting aspects in these areas. After consultation between Region IV and the Division of Regional Inspection Support in the Office of Nuclear Reactor Regulation, the

NRC determined that this is the first assessment letter to identify these cross-cutting themes at Fort Calhoun Station. Therefore, the NRC has only documented the themes in this letter. If these themes continue through the next assessment period, the NRC will evaluate the effectiveness of your actions to address them to determine whether additional NRC follow-up should be accomplished, as described in Section 14.02 of Inspection Manual Chapter 0305, "Operating Reactor Assessment Program."

From July 1, 2014, to June 30, 2015, the NRC issued six Severity Level IV traditional enforcement violations associated with impeding the regulatory process, four of which involved the implementation of the 10 CFR 50.59 process. Therefore, the NRC plans to conduct Inspection Procedure 92723, "Follow-Up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period," to follow-up on these violations.

The enclosed inspection plan lists the inspections scheduled through June 30, 2017. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the second half of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. If circumstances warrant any changes to the inspection plan, the NRC will discuss those changes with you as soon as possible. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence. In addition, to monitor your continuing efforts to sustain improved plant performance and comply with the commitments identified in our December 17, 2013 Confirmatory Action Letter EA-13-243 (ADAMS ML13351A395), NRC inspections will be conducted for the remaining open items in coordination with their completion.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the site, and will aid staff in development of a Final Safety Evaluation for the site. The date for the onsite component at your site is being coordinated with your staff. To allow sufficient time for preparations, a site-specific audit plan for the visit will be provided in advance.

L. Cortopassi

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In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 817-200-1173 with any questions you have regarding this letter.

Sincerely,

/RA/

Geoffrey B. Miller
Chief, Project Branch D
Division of Reactor Projects

Docket: 50-285
License: DPR-40

Enclosure: Fort Calhoun Station
Inspection/Activity Plan

L. Cortopassi

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ADAMS Accession No. ML15243A581

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NAME	GMiller	AVegel	TPruett
SIGNATURE	/RA/	/RA/	/RA/
DATE	8/27/15	8/27/15	8/27/15

Letter to Louis P. Cortopassi from Geoffrey B. Miller dated September 1, 2015

Subject: MID-CYCLE ASSESSMENT LETTER FOR FORT CALHOUN STATION
(REPORT 05000285/2015005)

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Electronic Distribution for Fort Calhoun Station

Fort Calhoun

Inspection / Activity Plan

07/01/2015 - 06/30/2017

Unit Number	Planned Dates Start End	Inspection Activity	Title	No. of Staff on Site
1	11/16/2015 11/20/2015	EXAM - INITIAL OPERATOR EXAM		4
		X02544	INITIAL EXAM FC(02/2015)	
1	12/14/2015 12/18/2015	X02544	INITIAL EXAM FC(02/2015)	
1	06/29/2015 09/01/2015	FCSSIT06 - SPECIAL INSPECTION FOR AFW VALVES		2
		IP 711153	Followup of Events and Notices of Enforcement Discretion	
1	08/03/2015 08/07/2015	EP-2 - HAB EXERCISE INSPECTION		5
		IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	08/03/2015 08/07/2015	IP 7111407	Exercise Evaluation - Hostile Action (HA) Event	
1	08/03/2015 08/07/2015	EP-3 - EP PERFORMANCE INDICATORS		2
		IP 71151-EP01	Drill/Exercise Performance	
1	08/03/2015 08/07/2015	IP 71151-EP02	ERO Readiness	
1	08/03/2015 08/07/2015	IP 71151-EP03	Alert & Notification System Reliability	
1	09/01/2015 09/30/2015	ISFSI - ROUTINE INSPECTION (1 WEEK IN THE MONTH)		1
		IP 60855	Operation Of An ISFSI	
1	10/19/2015 10/23/2015	EB2-05T - TRIENNIAL FIRE PROTECTION INSPECTION		5
		IP 7111105X	Fire Protection - NFPA 805 (Triennial)	
1	11/02/2015 11/06/2015	IP 7111105X	Fire Protection - NFPA 805 (Triennial)	
1	11/16/2015 11/20/2015	RS 24 - RADIATION SAFETY		2
		IP 71124.02	Occupational ALARA Planning and Controls	
1	11/16/2015 11/20/2015	IP 71124.04	Occupational Dose Assessment	
1	11/16/2015 11/20/2015	TSB 52B - BIENNIAL PI&R INSPECTION		4
		IP 71152B	Problem Identification and Resolution	
1	12/07/2015 12/11/2015	IP 71152B	Problem Identification and Resolution	
1	06/27/2016 07/01/2016	INSP - BIENNIAL REQUAL INSPECTION		2
		IP 7111111B	Licensed Operator Requalification Program	
1	07/18/2016 07/22/2016	RS 5678 - RADIATION SAFETY - TEAM		4
		IP 71124.05	Radiation Monitoring Instrumentation	
1	07/18/2016 07/22/2016	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1	07/18/2016 07/22/2016	IP 71124.07	Radiological Environmental Monitoring Program	
1	07/18/2016 07/22/2016	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
1	07/25/2016 08/12/2016	EB1-17T - FCS PERM PLANT MODS & 50.59 INSPECTION		3
		IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

Fort Calhoun

Inspection / Activity Plan

07/01/2015 - 06/30/2017

Unit Number	Planned Dates Start End	Inspection Activity	Title	No. of Staff on Site
		EP-1 - EP PERFORMANCE INDICATORS		1
1	10/03/2016 10/07/2016	IP 71151-EP01	Drill/Exercise Performance	
1	10/03/2016 10/07/2016	IP 71151-EP02	ERO Readiness	
1	10/03/2016 10/07/2016	IP 71151-EP03	Alert & Notification System Reliability	
		EP-2 - BIENNIAL EP PROGRAM INSPECTION		1
1	10/03/2016 10/07/2016	IP 7111402	Alert and Notification System Testing	
1	10/03/2016 10/07/2016	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	10/03/2016 10/07/2016	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	10/03/2016 10/07/2016	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
		RS 12 PI - RADIATION SAFETY		2
1	10/03/2016 10/07/2016	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	10/03/2016 10/07/2016	IP 71124.02	Occupational ALARA Planning and Controls	
1	10/03/2016 10/07/2016	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	10/03/2016 10/07/2016	IP 71151-PR01	RETS/ODCM Radiological Effluent Occurrences	
		71111.08 - INSERVICE INSPECTION		1
1	10/03/2016 10/14/2016	IP 7111108P	Inservice Inspection Activities - PWR	
		RS 13 PI - RADIATION SAFETY		2
1	03/27/2017 03/31/2017	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	03/27/2017 03/31/2017	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	03/27/2017 03/31/2017	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	03/27/2017 03/31/2017	IP 71151-PR01	RETS/ODCM Radiological Effluent Occurrences	
		EB1-07T - FCS HEAT SINK PERFORMANCE		1
1	05/22/2017 05/26/2017	IP 7111107T	Heat Sink Performance	
		RS 24 - RADIATION SAFETY		2
1	06/12/2017 06/16/2017	IP 71124.02	Occupational ALARA Planning and Controls	
1	06/12/2017 06/16/2017	IP 71124.04	Occupational Dose Assessment	