

LIC-16-0099
November 18, 2016

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Fort Calhoun Station, Unit No. 1
Renewed Facility Operating License No. DPR-40
NRC Docket No. 50-285

Subject: License Amendment Request (LAR) 16-06; Removal of License Condition 3.D., Fire Protection Program

References:

1. Letter from OPPD (L. Cortopassi) to USNRC (Document Control Desk), "Supplement to License Amendment Request 10-07, Proposed Changes to Adopt NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants (2001 Edition) at Fort Calhoun Station," dated April 10, 2014 (LIC-14-0042) (ML14115A296)
2. Letter from OPPD (T. Burke) to USNRC (Document Control Desk), "Certification of Permanent Cessation of Power Operations," dated June 24, 2016 (LIC-16-0043) (ML16176A213)
3. Letter from OPPD (T. Burke) to USNRC (Document Control Desk), "Certification of Permanent Cessation of Power Operations," dated August 25, 2016 (LIC-16-0067) (ML16242A127)
4. Letter from OPPD (T. Burke) to NRC (Document Control Desk), "Certification of Permanent Removal of Fuel from the Reactor Vessel," dated November 13, 2016 (LIC-16-0074) (ML16319A254)
5. Letter from NRC (J. Rankin) to OPPD (L. Cortopassi), "Fort Calhoun Station – Issuance of Amendment Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in Accordance with 10 CFR 50.48(c) (TAC No. ME7244) dated June 16, 2014 (NRC-14-0072) (ML14098A092)
6. Letter from OPPD (J. A. Reinhart) to USNRC (Document Control Desk), "License Amendment Request 10-07, Proposed Changes to Adopt NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants (2001 Edition) at Fort Calhoun Station," dated September 28, 2011 (LIC-11-0099) (ML112760660)

In accordance with the provisions of 10 CFR 50.90, the Omaha Public Power District (OPPD), is submitting a request for an amendment to the Operating License for Fort Calhoun Station (FCS), Unit No. 1.

The proposed amendment would delete License Condition 3.D., "Fire Protection Program," which requires that FCS implement and maintain a fire protection program that complies with the requirements of 10 CFR 50.48(a) and 10CFR 50.48(c) as specified in the license amendment request dated September 28, 2011 (Reference 6).

Amendment No. 275 to Renewed Operating License DPR-40 (Reference 5) implemented OPPD's transition to a risk-informed, performance-based fire protection program based on National Fire Protection Association (NFPA) 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition" (NFPA 805), in accordance with 10 CFR 50.48(a) and 10 CFR 50.48(c). With the docketing of the certification for permanent removal of fuel from the reactor vessel pursuant to 10 CFR 50.82(a)(1)(ii) on November 13, 2016 (Reference 4), the 10 CFR Part 50 license for Fort Calhoun Station no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel, as specified in 10 CFR 50.82(a)(2). In support of this condition, the FCS license condition 3.D. is being proposed for deletion to conform to this permanently shut down and defueled condition in accordance with 10 CFR 50.36(c)(6).

FCS will maintain a Fire Protection program in accordance with 10CFR 50.48 (f) as required with FCS power operations terminated and the reactor permanently defueled. (References 2, 3, and 4)

The proposed amendment would modify the Operating License to make the requested changes. The enclosure contains a description of the proposed changes, the supporting technical analyses, and the No Significant Hazards Consideration determination.

The proposed changes have been reviewed and approved by the Fort Calhoun Station Plant Operations Review Committee (PORC).

OPPD requests approval of the proposed license amendment by November 30, 2017, with the amendment to be implemented within 90 days of issuance.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated State of Nebraska official.

There are no regulatory commitments contained within this letter.

If you should have further questions, please contact Mr. Bradley H. Blome, Manager – Site Regulatory Assurance, at 402-533-7270.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 18, 2016.

Respectfully,

A handwritten signature in black ink, appearing to read "Shane M. Marik". The signature is fluid and cursive, with the first name "Shane" written in a larger, more prominent script than the last name "Marik".

Shane M. Marik
Site Vice President and CNO

SMM/epm

Enclosure: OPPD's Evaluation of the Proposed Change

- c: K. M. Kennedy, NRC Regional Administrator, Region IV
- C. F. Lyon, NRC Senior Project Manager
- S. M. Schneider, NRC Senior Resident Inspector
- Director of Consumer Health Services, Department of Regulation and Licensure,
Nebraska Health and Human Services, State of Nebraska

OPPD's Evaluation of the Proposed Change

License Amendment Request (LAR) 16-06:

**Request to Eliminate License Condition 3.D, Fire Protection Program from plant
Technical Specifications**

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
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1.0 SUMMARY DESCRIPTION

The Omaha Public Power District (OPPD) hereby requests an amendment to Fort Calhoun Station (FCS), Unit No. 1 Renewed Facility Operating License No. DPR-40 to remove existing license condition 3.D., "Fire Protection Program," of the Operating License (OL). The OL currently requires that FCS implement and maintain a fire protection (FP) program that complies with the requirements of 10 CFR 50.48(a) and 10CFR 50.48(c) as specified in the License Condition. This proposed change requests deletion of the current requirement since 10CFR 50.48(f) is specifically applicable to a permanently defueled reactor.

The proposed change is requested because OPPD has permanently ceased power operation at FCS and has permanently removed fuel from the reactor vessel (References 6.2, 6.3 and 6.4). Therefore, the requirements of 10 CFR 50.48(f) now apply to FCS, and there is no need to maintain a FP program in accordance with License Condition 3.D., since it is applicable to an operating reactor. In a defueled condition, FCS will comply the requirements of 10 CFR 50.48(f) as required.

2.0 DETAILED DESCRIPTION

On June 16, 2014, Amendment No. 275 to Renewed Operating License DPR-40 (Reference 6.5) implemented OPPD's transition to a risk-informed, performance-based FP program based on National Fire Protection Association (NFPA) 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition" (NFPA 805), in accordance with 10 CFR 50.48(a) and 10 CFR 50.48(c). With the docketing of the certification of permanent removal of fuel from the reactor vessel pursuant to 10 CFR 50.82(a)(1)(ii) on November 13, 2016 (Reference 6.4), the 10 CFR Part 50 license for FCS no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel, as specified in 10 CFR 50.82(a)(2). In support of this condition, the FCS license condition 3.D. is being proposed for deletion to conform to this permanently shut down and defueled condition in accordance with 10 CFR 50.36(c)(6).

During the decommissioning process, a FP program is required by 10 CFR 50.48(f) to address the potential for fires that could result in a radiological hazard. This regulation is applicable regardless of whether a requirement for a FP program is included in the facility license. License Condition 3.D. is no longer appropriate because it establishes requirements that relate to the ability to shut down the plant safely in the event of a fire. These provisions are no longer applicable to FCS. FP program aspects that relate to a permanently defueled condition are specifically and adequately addressed by 10 CFR 50.48(f). Therefore, a license condition requiring such a program for a permanently shutdown and defueled plant is not required.

License Condition 3.D. specifies conditions for making changes to the FP program without prior NRC approval. The conditions specified in the License Condition include consideration of risk metrics (e.g., core damage frequency) associated with power operation. The conditions specified in License Condition 3.D. are no longer required or appropriate for a decommissioned reactor, since 10 CFR 50.48(f)(3) applies and specifies the applicable conditions for making changes to the FP program after permanent removal of fuel from the reactor vessel.

3.0 TECHNICAL EVALUATION

As stated above, the current FP license condition is applicable to an operating reactor as the requirements of 10 CFR 50.48(a) and 10CFR50.48(c) apply to holders of operating licenses issued under 10 CFR 50. The FCS license no longer authorizes operation of the reactor after permanent cessation of operation and certification of fuel removal. However, maintenance of a FP program will remain a requirement and will be governed by the requirements of 10 CFR 50.48(f).

License Condition 3.D. is proposed for elimination consistent with the restriction of 10 CFR 50.82(a)(2) that FCS is no longer authorized to operate the reactor or place fuel in the reactor vessel.

The current License Condition requires FCS to maintain a FP program in accordance with 10 CFR 50.48(a) and 10 CFR 50.48(c). Additionally, the License Condition includes criteria for making changes to the approved program. These criteria are specified in sub-sections 3.D.(1), (2) and (3) of the License Condition.

License Condition 3.D is not applicable to a defueled reactor and will be replaced with the requirements of 10 CFR 50.48 (f). The criteria identified in the License Condition for making changes to the FP program (3.D. (1), (2) and (3)) are no longer applicable to a defueled reactor based on the following.

3.D.(1) applies to "Risk-Informed Changes that May Be made without Prior NRC Approval." This criterion is no longer applicable as changes to the FP program (including compliance to NFPA codes) must now be made in accordance with requirements of 10 CFR 50.48(f).

3.D.(2) addresses "Other Changes that May Be Made Without Prior NRC Approval." This criterion is no longer applicable as changes to the FP program (including compliance to NFPA codes) must now be made in accordance with requirements of 10 CFR 50.48(f).

3.D.(3), "Transition License Conditions," addresses the requirements for making changes during the transition phase to NFPA 805. This criterion is no longer applicable based on the fact that changes to the FP program must now be made in accordance with the requirements of 10 CFR 50.48(f).

The above criteria are no longer applicable to a permanently defueled reactor. OPPD's Board of Directors voted on June 16, 2016, to permanently cease operation of FCS by December 31, 2016. The intention to permanently shut down FCS was communicated to the NRC in OPPD letter LIC-16-0043, dated June 24, 2016 (Reference 6.2). OPPD submitted a letter dated November 13, 2016, (Reference 6.4) certifying the permanent removal of fuel from the reactor vessel in accordance with 10 CFR 50.82(a)(1)(ii). As such, the 10 CFR 50 license no longer authorizes reactor operation or emplacement or retention of fuel in the reactor vessel and the fire protection License Condition as specified in the current OL will no longer be consistent with the non-operating status of the plant. This inconsistency is addressed by transition to 10 CFR 50.48(f).

The revised License Condition will read as follows:

3.D. DELETED

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

4.1.1 Title 10 CFR Part 50.48, Fire Protection

4.2 Precedent

4.2.1 Several plants currently in the decommissioning process, including Kewaunee, Crystal River and Vermont Yankee, have eliminated their fire protection license condition and have established FP programs that meet the requirements of 10 CFR 50.48(f) for a decommissioned plant.

4.3 No Significant Hazards Consideration

The Omaha Public Power District (OPPD) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change removes the Fire Protection License Condition which is applicable to an operating reactor. Because FCS is permanently defueled, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because: 1) the proposed amendment does not alter, degrade, or prevent action described or assumed in any accident in the USAR from being performed, 2) the proposed amendment does not alter any assumptions previously made in evaluating radiological consequences, and 3) the proposed amendment does not affect the integrity of any fission product barrier.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not alter any, safety limits, or safety analysis assumptions associated with the operation of the plant. The proposed change does not introduce any new accident initiators, nor does the change reduce or adversely affect the capabilities of any plant structure or system in the performance of its safety function.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed change does not alter the manner in which safety limits or limiting safety system settings are determined. The safety analysis acceptance criteria are not affected by the proposed change. The proposed change does not change the design function of any equipment assumed to operate in the event of an accident.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, OPPD concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review of the proposed amendment has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22 (c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

- 6.1. Letter from OPPD (L. Cortopassi) to USNRC (Document Control Desk), "Supplement to License Amendment Request 10-07, Proposed Changes to Adopt NFPA 805, Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants (2001 Edition) at Fort Calhoun Station," dated April 10, 2014 (LIC-14-0042) (ML14115A296)
- 6.2. Letter from OPPD (T. Burke) to USNRC (Document Control Desk) - "Certification of Permanent Cessation of Power Operations," dated June 24, 2016 (LIC-16-0043) (ML16176A213)
- 6.3. Letter from OPPD (T. Burke) to USNRC (Document Control Desk), "Certification of Permanent Cessation of Power Operations," dated August 25, 2016 (LIC-16-0067)(ML16242A127)
- 6.4. Letter from OPPD (T. Burke) to USNRC (Document Control Desk) - "Certification of Permanent Removal of Fuel from the Reactor Vessel," dated November 13, 2016 (LIC-16-0074) (ML16319A254)
- 6.5. Letter from NRC (J. Rankin) to OPPD (L. Cortopassi), "Fort Calhoun Station – Issuance of Amendment Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in Accordance with 10 CFR 50.48(c) (TAC No. ME7244)" dated June 16, 2014 (NRC-14-0072) (ML14098A092)

**Fort Calhoun Station, Unit No. 1
Renewed Facility Operating License No. DPR-40**

Mark-up of License Condition 3.D

[Word-processor mark-ups using “double underline/~~strikeout~~” feature
for “new text/deleted text” respectively

- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form for sample analysis or instrument calibration or when associated with radioactive apparatus or components;
 - (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by operation of the facility.
- 3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter 1: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
 - A. Maximum Power Level

Omaha Public Power District is authorized to operate the Fort Calhoun Station, Unit 1, at steady state reactor core power levels not in excess of 1500 megawatts thermal (rate power).
 - B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. XXX, are hereby incorporated in the license. Omaha Public Power District shall operate the facility in accordance with the Technical Specifications.
 - C. Security and Safeguards Contingency Plans

The Omaha Public Power District shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Fort Calhoun Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan," submitted by letter dated May 19, 2006.

OPPD shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The OPPD CSP was approved by License Amendment No. 266 and modified by Amendment No. 284.

D. DELETED Fire Protection Program

Omaha Public Power District shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment request dated September 28, 2011 (and supplements dated December 19, 2011, December 22, 2011, March 20, 2012, July 24, 2012, August 24, 2012, September 27, 2012, April 23, 2013, May 21, 2013, July 29, 2013, September 12, 2013, October 11, 2013, November 4, 2013, November 11, 2013, December 18, 2013, January 24, 2014, February 28, 2014, April 10, and June 11, 2014) and as approved in the safety evaluation dated June 16, 2014. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(1) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the asbuilt, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer reviewed fire PRA model, methods that have been approved by NRC through a plant specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- (a) Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
- (b) Prior NRC review and approval is not required for individual changes that result in a risk increase less than 1×10^{-7} /year (yr) for core damage frequency (CDF) and less than 1×10^{-8} /yr for large early release frequency (LERF). The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

~~(2) Other Changes that May Be Made Without Prior NRC Approval~~

~~(a) Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program~~

~~Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805, Chapter 3, element is functionally equivalent to the corresponding technical requirement. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard.~~

~~The licensee may use an engineering evaluation to demonstrate that changes to certain NFPA 805, Chapter 3, elements are acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are as follows:~~

- ~~• "Fire Alarm and Detection Systems" (Section 3.8);~~
- ~~• "Automatic and Manual Water Based Fire Suppression Systems" (Section 3.9);~~
- ~~• "Gaseous Fire Suppression Systems" (Section 3.10); and,~~
- ~~• "Passive Fire Protection Features" (Section 3.11).~~

~~This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.~~

~~(b) Fire Protection Program Changes that Have No More than Minimal Risk Impact~~

~~Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated June 16, 2014, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense in depth and safety margins are maintained when changes are made to the fire protection program.~~

~~(3) Transition License Conditions~~

~~(a) Before achieving full compliance with 10 CFR 50.48(c), as specified by D.(3)(b) and D.(3)(c) below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in D.(2)(b) above.~~

~~(b) The licensee shall implement the modifications to its facility, as described in Enclosure 1, Attachment S, Table S-2, "Plant Modifications Committed," of OPPD letter LIC-14-0042 dated April 10, 2014, to complete the transition to full compliance with 10 CFR 50.48(c) by the end of the second refueling outage following issuance of the license amendment. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.~~

~~(c) The licensee shall implement the items listed in Enclosure 1, Attachment S, Table S-3, "Implementation Items," of OPPD letter LIC-14-0042, dated April 10, 2014, no later than 12 months after issuance of the license amendment.~~

E. Updated Final Safety Analysis Report

The Omaha Public Power District Updated Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. The Omaha Public Power District shall complete these activities no later than August 9, 2013, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

LIC-16-0099
Enclosure, Attachment 2

**Fort Calhoun Station, Unit No. 1
Renewed Facility Operating License No. DPR-40**

Clean License Condition 3.D

- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form for sample analysis or instrument calibration or when associated with radioactive apparatus or components;
 - (5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by operation of the facility.
- 3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter 1: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
 - A. Maximum Power Level

Omaha Public Power District is authorized to operate the Fort Calhoun Station, Unit 1, at steady state reactor core power levels not in excess of 1500 megawatts thermal (rate power).
 - B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. XXX, are hereby incorporated in the license. Omaha Public Power District shall operate the facility in accordance with the Technical Specifications.
 - C. Security and Safeguards Contingency Plans

The Omaha Public Power District shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Fort Calhoun Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan," submitted by letter dated May 19, 2006.

OPPD shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The OPPD CSP was approved by License Amendment No. 266 and modified by Amendment No. 284.

D. DELETED

E. Updated Final Safety Analysis Report

The Omaha Public Power District Updated Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. The Omaha Public Power District shall complete these activities no later than August 9, 2013, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

The Updated Final Safety Analysis Report supplement, as revised, shall be included in the next scheduled update to the Updated Final Safety Analysis Report required by 10 CFR 50.71(e)(4) following issuance of this renewed license. Until that update is complete, the Omaha Public Power District may make changes to the programs and activities described in the supplement without prior Commission approval, provided that the Omaha Public Power District evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

F. Appendix B

The Additional Conditions contained in Appendix B, as revised through Amendment No. 286, are hereby incorporated into this license. Omaha Public Power District shall operate the facility in accordance with the Appendix B Additional Conditions.

G. Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - 5. Training of response personnel
- (b) Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy
 - 5. Identification of readily-available pre-staged equipment
 - 6. Training on integrated fire response strategy
 - 7. Spent fuel pool mitigation measures
- (c) Actions to minimize release to include consideration of:
 - 1. Water spray scrubbing
 - 2. Dose to onsite responders

4. This renewed license is effective as of the date of issuance and shall expire at midnight on August 9, 2033.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by:
J.E. Dyer

J. E. Dyer, Director
Office of Nuclear Reactor Regulation

Attachments: 1. Appendix A - Technical Specifications
2. Appendix B - Additional Conditions

Date of Issuance: November 4, 2003