



EA-13-243

LIC-17-0075
December 14, 2017

Mr. K. M. Kennedy
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

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

Subject: Design and Licensing Basis Reconstitution Project (DLBRP) Commitment
Revision

References:

1. OPPD Letter (M. J. Fisher) to USNRC (K. M. Kennedy), "Confirmatory Action Letter Commitments Follow Up," dated March 10, 2017 (LIC-17-0029) (ML17069A441)
2. NRC Letter (K. M. Kennedy) to OPPD (M. J. Fisher), "Closure of Confirmatory Action Letter Commitments," dated April 12, 2017 (ML17102B737)
3. NRC Letter (J. Kim) to OPPD (M.J. Fisher), "Fort Calhoun Station, Unit 1 - Issuance of Amendment RE: Revise Current Licensing Basis to Use American Concrete Institute Ultimate Strength Requirements (CAC NO. MF8525; EPID L-2016-LLA-0013)," dated November 17, 2017 (ML17278A607)

Dear Mr. Kennedy:

In Reference 1, Omaha Public Power District (OPPD) proposed that the open Confirmatory Action Letter (CAL) items associated with the design and licensing basis reconstitution project (DLBRP) be closed to a new commitment that is more appropriate for the facility's decommissioning status. This was accepted and confirmed in NRC Closure of Confirmatory Action Letter Commitments (Reference 2). The current commitment is as follows:

1. Complete the following design and licensing basis reconstitution actions for sections directly associated with the spent fuel pool, spent fuel pool cooling, and directly required supporting structures, systems and components:
 - a) Identify and define the current design and licensing bases that support decommissioning functions and assure the bases are current, accurate, complete and retrievable.
 - b) Complete Phase 3 of the Key Calculation Project. Phase 3 consists of revising any deficient critical calculation or engineering analysis identified in Phase 2, as needed for facility decommissioning.
 - c) Validate the design and licensing basis has been translated into facility decommissioning by verifying that the operation, surveillance, maintenance and training of safety-related components do not compromise the design and licensing basis.

The above activities will be completed as they relate to facility decommissioning and will be performed for the following USAR Sections:

- Section 5.7 - Structures, Piling
- Section 5.11- Structures, Structures other than containment
- Section 8.3 - Electrical systems, Station Distribution
- Section 9.5 - Auxiliary Systems, Refueling System
- Section 9.6 - Auxiliary System, Spent Fuel Pool Cooling System
- Section 9.7 - Auxiliary Systems, Component Cooling Water System
- Section 9.8 - Auxiliary Systems, Raw Water system
- Appendix F - Classification of Structures and Equipment and Seismic Criteria

-OR-

2. Submit a License Amendment Request (LAR) for an independent spent fuel cooling system.

The completion date for this commitment is December 29, 2017. The commitment has been entered into the For Calhoun Station (FCS) corrective action program as condition report (CR) 2017-00842 and is tracked in the commitment tracking database under Action Request (AR) 66950.

Based on the initial FCS decommissioning schedule for completing the transfer of spent fuel to the Independent Spent Fuel Storage Installation (ISFSI), FCS pursued and completed Option 2 a License Amendment Request (LAR) for an independent spent fuel cooling system through approval of the LAR by the Plant Operations Review Committee (PORC). However, new timelines provided by potential dry cask vendors now show completing transfer of spent fuel to the ISFSI by the end of 2020. The updated timelines make the economic driver for the independent spent fuel cooling system no longer favorable. As a result, OPPD has decided not to complete Option 2 and will not be submitting the PORC approved LAR to the NRC for approval.

OPPD has assigned a dedicated team to the DLBRP and progress has been made on reconstitution of each of the above listed Defueled Safety Analysis Report (DSAR) sections. The DLBRP will result in multiple reviews and validation that operation, surveillance, maintenance and training of safety-related components have been translated into facility decommissioning. Item 1b (Key Calculations) is expected to be completed by December 29, 2017. However, based on the decision to change from submitting a LAR, the overall DLBRP will not be able to be completed by the original commitment date of December 29, 2017. Based on a detailed project schedule which includes contingency actions that address several project risks, the current DLBRP schedule shows project completion by June 25, 2018.

In addition to the originally listed Update Safety Analysis Report (USAR) sections (now converted to DSAR sections), Section 14.18, Fuel Handling Accident in Spent Fuel Pool, has been added to the scope of the project. Additionally, DSAR Section 5.11 will be completed as part of the Class One Structures (C1S) LAR which revised the design basis for C1S and was approved by the NRC on November 17, 2017 (Reference 3) with a 90 day implementation period.

In summary, OPPD requests that the commitment originally made in Reference 1 be revised to remove Option 2 along with the changes to Option 1 as discussed above and the commitment completion date be revised to June 25, 2018. Attachment 1 of this letter contains the revised regulatory commitment.

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

Respectfully,



Mary J. Fisher
Vice President, Energy Production & Nuclear Decommissioning

Attachment 1. Regulatory Commitments

BHB/cac/kgj

c: U. S. NRC Document Control Desk
R. L. Kellar, NRC Region IV Chief Fuel Cycle and Decommissioning Branch
R. S. Browder, NRC Region IV Senior Health Physicist
J. S. Kim, NRC Project Manager

Regulatory Commitments

This table identifies actions discussed in this letter for which OPPD commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
<p>1) Complete the following design and licensing basis reconstitution actions for sections directly associated with the spent fuel pool, spent fuel pool cooling, and directly required supporting structures, systems and components:</p> <ul style="list-style-type: none"> a. Identify and define the current design and licensing bases and assure the bases documentation remains current, accurate, complete and retrievable. b. Complete Phase 3 of the Key Calculation Project. Phase 3 consists of revising any deficient critical calculation or engineering analysis identified in Phase 2, as needed for facility decommissioning. c. Validate the design and licensing basis has been translated into facility decommissioning by verifying that the operation, surveillance, and maintenance of safety-related components do not compromise the design and licensing basis. <p>The above activities will be completed as they relate to facility decommissioning and will be performed for the following DSAR Sections:</p> <ul style="list-style-type: none"> • Section 5.7 - Structures, Piling • Section 5.11- Structures, Structures other than containment • Section 8.3 - Electrical systems, Station Distribution • Section 9.5 - Auxiliary Systems, Refueling System • Section 9.6 - Auxiliary System, Spent Fuel Pool Cooling System • Section 9.7 - Auxiliary Systems, Component Cooling Water System • Section 9.8 - Auxiliary Systems, Raw Water system • Section 14.18 – Fuel Handling Accident in Spent Fuel Pool • Appendix F - Classification of Structures and Equipment and Seismic Criteria 	X		Complete by 06/25/2018