



LIC-18-0011  
March 29, 2018

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Fort Calhoun Station  
Independent Spent Fuel Storage Installation  
NRC Docket No. 72-054

**Subject: Response to Request for Additional Information Regarding Omaha Public Power District's Decommissioning Funding Plan Update for Fort Calhoun Station Independent Spent Fuel Storage Installation**

References:

1. Letter from OPPD (L. P. Cortopassi) to USNRC (Document Control Desk), Fort Calhoun Station, Unit No. 1, 2015 Biennial Decommissioning Funding Status Report and Omaha Public Power District (OPPD) Nuclear Decommissioning Funding Plan for the Fort Calhoun Station Independent Spent Fuel Storage Installation (ISFSI), dated March 31, 2015 (ADAMS No.:ML15090A763)(LIC-15-0047)
2. Letter from USNRC (P. Longmire) to OPPD (M. J. Fisher), Request For Additional Information Regarding Omaha Public Power District's Decommissioning Funding Plan Update For Fort Calhoun Station Independent Spent Fuel Storage Installation, dated March 8, 2018 (CAC No.: 001028)(EPID No.: L-2017-FPR-0027)(ADAMS Package No.: ML18067A141) (NRC-18-016)

On March 31, 2015, OPPD submitted decommissioning funding plan update (DFP Update) for the independent spent fuel storage installation (ISFSI) at Fort Calhoun Station (Reference 1). On March 8, 2018 (Reference 2), the NRC provided OPPD with Requests for Additional Information (RAI) regarding the DFP Update. Attachment 1 of this letter provides the responses to the RAI.

This letter contains no regulatory commitments.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Bradley H. Blome, Director - Licensing and Regulatory Assurance at (402) 533-6041.

Respectfully,

A handwritten signature in black ink, appearing to read "Mary J. Fisher". The signature is fluid and cursive, with the first name "Mary" being more prominent than the last name "Fisher".

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

MJF/epm

Attachment: Response to Request for Additional Information

c: K. M. Kennedy, NRC Regional Administrator, Region IV  
J. Kim, NRC Project Manager  
J. D. Parrott, NRC Senior Project Manager  
R. S. Browder, NRC Senior Health Physicist, Region IV

**ATTACHMENT**

**REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING**  
**OMAHA PUBLIC POWER DISTRICT'S DECOMMISSIONING FUNDING PLAN**  
**UPDATE FOR**  
**FORT CALHOUN STATION INDEPENDENT SPENT FUEL STORAGE INSTALLATION**  
**DOCKET NO. 72-54**

**Regulatory Requirement**

Pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 72.30(c), at the time of license renewal and at intervals not to exceed 3 years, the decommissioning funding plan (DFP) required to be submitted by 10 CFR 72.30(b) must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. The DFP must update the information submitted with the original or prior approved plan. In addition, the DFP must also specifically consider the effect of the following events on decommissioning costs, as required by 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

**Background**

By letter dated March 31, 2015, Omaha Public Power District (OPPD) submitted for U.S. Nuclear Regulatory Commission (NRC) staff review and approval, a decommissioning funding plan update (DFP Update) for the independent spent fuel storage installation (ISFSI) at Fort Calhoun Station (Agencywide Documents Access and Management System Accession No. ML15090A763). The NRC staff reviewed OPPD's DFP update for the ISFSI and believes OPPD's submittal was not sufficient to meet the intent of the requirement in 72.30(c). The DFP update does not provide sufficient information to allow the NRC to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically considered.

**RAI 1**

For the ISFSI, provide a revised DFP that includes information on the occurrence, and the effect on decommissioning costs, of each of the events listed in 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

OPPD Response:

As noted 10 CFR 72.30(c) defines specific events that must be considered in the subsequent updates. The submittal of DFP Update of the ISFSI March 31, 2015, should have contained the following:

1. No spills of radioactive material producing additional residual radioactivity in onsite subsurface material have occurred.
2. Facility modifications that affected the ISFSI, including those that were implemented within the licensed area, were assessed and had no impact.
3. There were no changes in authorized possession limits.
4. No active decommissioning occurred during the period encompassed by the referenced submittal (ML15090A763), thus, there have not been any actual remediation costs that exceed the previous cost estimate.