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 ADD= Marlayna Doell,
 Kimberly Conway

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Docket: NRC-2019-0073

Agency Activities in Response to a Portion of the Nuclear Energy Innovation and Modernization Act

Comment On: NRC-2019-0073-0036

Stakeholder Input on Best Practices for Establishment and Operation of Local Community Advisory Boards in Response to a Portion of the Nuclear Energy Innovation and Modernization Act; Reopening of Comment Period

Document: NRC-2019-0073-DRAFT-0041

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Submitter Information

Name: B Blome

Address: United States,

Email: bblome@oppd.com

Submitter's Representative: Director - Licensing & Regulatory Assurance

Organization: Omaha Public Power District

Government Agency Type: Local

Government Agency: Omaha Public Power District

General Comment

The Omaha Public Power District (OPPD) is a publicly-owned electric utility in Nebraska, operating as a political subdivision in the country's only all public power state. As such, it is governed by state statutes and led by a publicly-elected eight-member Board of Directors.

OPPD is currently in the process of decommissioning its Fort Calhoun Station (FCS) nuclear power facility, a topic of understandable public interest. OPPD believes it has sufficient channels and platforms for customer-owners to remain informed of activities related to decommissioning. Additionally, customer-owners have an array of options to become involved in the District's decision-making and operational processes:

- OPPD holds regularly scheduled public meetings at its headquarters, offering the opportunity for customers to go on record with comments on matters associated with OPPD, including those associated with the decommissioning of FCS.

- A decommissioning status report is provided each month at the Board of Directors Committee Meeting, which is open to the public. This meeting, as well as the monthly full Board of Directors Meeting, is

livestreamed to the public [<https://livestream.com/OPPD>] and the video recording is made available afterwards through OPPD's public website [<https://www.oppd.com/>] or directly through YouTube [<https://www.youtube.com/user/OmahaPublicPower/>].

- The Board of Directors and OPPD senior management regularly update a series of Strategic Directives, which the Board uses to hold OPPD accountable on behalf of its customer-owners. The Public Information Subcommittee and the Board at large continues to find the district in compliance with SD-13: Stakeholder Outreach and Engagement, which directs OPPD to:
 - Share context with customer-owners for key decisions.
 - Use an integrated, clear and transparent engagement process that provides meaningful ways for customer-owners to participate and provide feedback and is representative of the interested and impacted customer-owner segments that OPPD serves.
 - Continuously evaluate and improve its outreach and engagement processes.
- OPPD's robust outreach and engagement platforms include formal channels such as moderated focus groups and the OPPD Power Panel, a standing survey body. There are also strong, supportive relationships with stakeholders like mayors, city councils, first responders and chambers of commerce in communities around the plant.
- OPPD maintains multiple communication avenues for customer-owners to interact with District leadership, in addition to the open Board meetings. In all cases, the District is committed to timely acknowledgement and thoughtful response. People may:
 - Directly email the Board of Directors and/or senior management comments, concerns or suggestions.
 - Reach out through social media channels (e.g., Facebook [OmahaPublicPowerDistrict], Twitter [@OPPDcares] and LinkedIn [omaha-public-power-district])
 - View material and provide comment through the OPPD Listens website [<https://www.oppd.com/community/oppd-listens>] on matters of significant prominence and/or complexity.
- OPPD's Corporate Marketing and Communications group maintains the content marketing site The Wire [<https://oppdthewire.com/>], where stakeholders can inform themselves of District activities and offer feedback through the site's comment platform.
- The District routinely participates in community happenings such as fairs, parades and educational speaking events. Customer-owners are encouraged to engage with OPPD personnel during these occasions, with the expectation for the District to forward concerns and provide responses as necessary.

In summary, OPPD has found its chosen and tested methods of engaging with customer-owners and stakeholders across the service territory, including those near FCS, to be highly effective and meet the goal of remaining transparent and responsive. Based on this, OPPD strongly recommends maintaining the provisions in the current decommissioning regulations and guidance, deferring decisions on a Community Advisory Board (CAB) to state and local authorities.

M. J. Fisher
 OPPD Vice President
 Energy Production & Nuclear Decommissioning