

Omaha Public Power District
444 South 16th Street Mail
Omaha, Nebraska 68102-2247
402/636-2000

September 18, 1992
LIC-92-302R

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from OPPD (K.J. Morris) to NRC (Document Control Desk) dated October 31, 1989 (LIC-89-930)
 3. SECY-90-039 - Individual Plant Examinations Licensing Schedules dated February 7, 1990
 4. Letter from NRC (A. Bournia) to OPPD (W.G. Gates) dated March 27, 1990
 5. NUREG-1407 - Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) dated June 1991
 6. Generic Letter (GL) 88-20, Supplement 4 dated June 28, 1991
 7. Letter from OPPD (W.G. Gates) to NRC (Document Control Desk) dated December 23, 1991 (LIC-91-330R)
 8. Letter from NRC (S. D. Bloom) to OPPD (W.G. Gates) dated June 17, 1992

Gentlemen:

SUBJECT: Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities

Reference 8 requested that OPPD submit projected milestones and schedule for completing the IPEEE to the NRC no later than September 18, 1992. The attachment provides OPPD's response, including the method selected for addressing each external event, as well as the schedule and milestones. In response to Reference 6, OPPD previously provided the NRC a description of our program for completing the IPEEE in Reference 7.

OPPD is planning a final submittal (i.e., June 30, 1995) that is one year beyond the schedule requested by the GL to complete the seismic event and internal fire portions of the IPEEE. GL 88-20, Supplement 4 encourages coordination of the seismic IPEEE with USI A-46. Thus, OPPD intends to conduct the seismic IPEEE and USI A-46 walkdowns concurrently. The coordination between the USI A-46 project and the seismic IPEEE project submittal controls the schedule for the seismic IPEEE. The USI A-46 project will require an initial plant walkdown during the 1993 refueling outage and a final plant walkdown during the 1995 refueling outage. A final walkdown will be necessary to resolve any vulnerabilities/outliers identified during the evaluation of results of the 1993

9209240393 920918
PDR ADOCK 05000285
P PDR

220063

Employment with Equal Opportunity
Male/Female

A001
11

U. S. Nuclear Regulatory Commission
LIC-92-302R
Page 2

during the evaluation of results of the 1993 refueling outage walkdown. To account for seismically induced fires, the fire hazards analysis cannot be completed until the seismic analysis is near completion. The proposed schedule is necessitated by the scope of the IPEEE and the need to maximize use of OPPD personnel resources.

OPPD will submit the IPEEE analyses, excluding the internal fire and seismic analyses, by December 31, 1993. OPPD will submit the final IPEEE report, including the internal fire and the seismic analyses to the NRC by June 30, 1995.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/grc

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Project Manager

ATTACHMENT

Individual Plant Examination for External Events (IPEEE) for the Fort Calhoun Station - Method of Performance and IPEEE Schedule

I. External Events and Analysis Methods

The IPEEE requires five external events to be assessed. They include seismic events, internal fires, high winds and tornadoes, external floods and transportation and nearby facility accidents.

Seismic Events: OPPD plans to perform the seismic IPEEE as a 0.3g focused scope plant using a seismic margins methodology in accordance with Reference 5.

Internal Fires: An internal fires IPEEE will be accomplished by performing a fire probabilistic risk assessment (PRA) under a joint effort with EPRI and several other utilities. The internal fire PRA will be performed using the analysis delineated in Section 4.1 of Reference 5 and the guidance of NUREG/CR-2300. The EPRI fire events database will be used to incorporate the most current generic fire events information. The internal fire PRA will also adopt the Fire Vulnerability Evaluation Methodology (FIVE) propagation and damage assessment models for screening purposes and the FIVE walkdown procedures for addressing Fire Risk Scoping Study (FRSS) issues.

High Winds, External Floods and Transportation and Nearby Facility Accidents: Examination of these events will follow the process prescribed in Section 5.2 of Reference 5. Analysis of high winds will include determination of site hazards from NUREG/CR-4461, and bounding PRA of potential vulnerabilities at FCS.

II. Schedule

1993 Refueling Outage	Initial IPEEE/USI A-46 Seismic Walkdown (Portions requiring a refueling outage)
December 31, 1993	Complete evaluation for High Winds, External Floods and Transportation and Nearby Facility accidents.
December 31, 1993	IPEEE Analyses submitted to the NRC excluding Internal Fire and Seismic Events Analyses.
June 30, 1994	Initial evaluation completed for Seismic Events
1995 Refueling Outage	Final IPEEE/USI A-46 Seismic Walkdown (Portions requiring a refueling outage)
June 30, 1995	Final IPEEE Report Submitted to NRC including Internal Fires and Seismic Events Analyses.