

Omaha Public Power District

444 South 16<sup>th</sup> Street Mall  
Omaha, NE 68102-2247

November 27, 2012  
LIC-12-0170

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

- References:
1. Docket No. 50-285
  2. Letter from NRC (E. J. Leeds & M. R. Johnson) to OPPD (D. J. Bannister), "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ML12053A340) (NRC-12-0021)
  3. NRC Letter, Endorsement of Nuclear Energy Institute (NEI) 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," dated May 31, 2012 (ML12144A142)
  4. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "OPPD 90-Day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendations 2.1 and 2.3 (Flooding), of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated June 8, 2012 (LIC-12-0078) (ML12163A249)

**Subject: OPPD 180-day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident**

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 2 to all power reactor licensees. Enclosure 4 of Reference 2 contains specific Requested Actions, Requested Information, and Required Responses associated with Recommendation 2.3: Flooding. On June 11, 2012, the Omaha Public Power District (OPPD) submitted the 90-day response (Reference 4) requested in Enclosure 4 of Reference 2, confirming that OPPD would use the NRC-endorsed flooding walkdown procedure.

For Recommendation 2.3: Flooding (walkdowns), Enclosure 4 of Reference 2 states that within 180 days of the NRC's endorsement of the walkdown process (Reference 3), each addressee will submit a final response, including a list of any areas that are unable to be inspected due to restricted access and a schedule for when the walkdown will be completed. Enclosure 1 contains OPPD's 180-day response to Reference 2, Recommendation 2.3: Flooding, for Fort Calhoun Station.

ADDI  
NRR

Conditions identified during the walkdowns were documented and entered into the corrective action program. Evaluations of the conditions are complete and no deficiencies were identified.

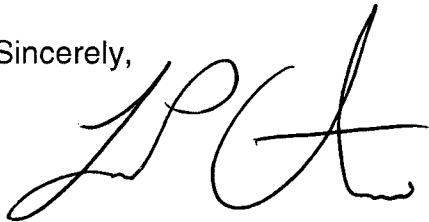
Enclosure 1, Page 12, "Restricted Access Area," documents a number of flooding features (penetrations and walls) that could not be inspected during the walkdown for several reasons including ongoing construction activities, maintenance support was required to gain visual access, or because of access restrictions due to high radiation levels. OPPD will complete these inspections in accordance with the one-time regulatory commitment described in Enclosure 2.

Enclosure 1, Page 13, "Inaccessible Area," documents three (3) areas that cannot be inspected since there is no reasonable means of physical access to those areas.

If you should have any questions, please contact Mr. Bill Hansher at (402) 533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read 'LPC', written over a white background.

Louis P. Cortopassi  
Site Vice President and CNO

LPC/JKG/mle

Enclosure 1: Flooding Walkdown Report

Enclosure 2: Regulatory Commitments Table

- c: E. J. Leeds, Director, Office of Nuclear Reactor Regulation  
E. E. Collins, Jr., NRC Regional Administrator, Region IV  
L. E. Wilkins, NRC Project Manager  
J. C. Kirkland, NRC Senior Resident Inspector

U.S. Nuclear Regulatory Commission  
LIC-12-0170  
Enclosure 1

**Flooding Walkdown Report in Response to the 50.54(f) Information  
Request Regarding Near-Term Task Force  
Recommendation 2.3: Flooding for  
Fort Calhoun Station**

**(54 Pages)**

**Regulatory Commitments Table**

<b>Commitment</b>	<b>Due Date</b>	<b>Action Request</b>
OPPD will complete the inspection of the flooding features classified as restricted access areas.	March 31, 2013	52024-09