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Omaha, NE 68102-2247

LIC-13-0124  
August 28, 2013

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

- References:
1. Docket No. 50-285
  2. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ML12056A044) (NRC-12-0023)
  3. NRC Interim Staff Guidance, JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012 (ML12221A339)
  4. Nuclear Energy Institute (NEI) 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, dated August 2012 (ML12240A307)
  5. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "OPPD Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated October 27, 2012 (ML12305A311) (LIC-12-0155)
  6. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Fort Calhoun Station Spent Fuel Pool Instrumentation Overall Integrated Plan," dated February 28, 2013 (ML13059A268) (LIC-13-0011)

**Subject: Omaha Public Power District's First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation**

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an Order (Reference 2) to Omaha Public Power District (OPPD) Fort Calhoun Station (FCS). Reference 2 was immediately effective and directs FCS to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 2.

Reference 2 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 3) and an overall integrated plan pursuant to Section IV, Condition C. Reference 3 endorses industry guidance document NEI 12-02, Revision 1 (Reference 4) with clarifications and exceptions identified in Reference 2. Reference 5 provided the FCS initial status report regarding reliable spent fuel pool instrumentation. Reference 6 provided the FCS overall integrated plan.

Reference 2 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 4 provides direction regarding the content of the status

reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 2, that delineates progress made in implementing the requirements of Reference 2. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

If you have any questions regarding this report, please contact Bill Hansher at 402-533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 28, 2013.



Louis P. Cortopassi  
Site Vice President and CNO

LPC/JLB/mle

Enclosure: First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

- c: E. J. Leeds, Director of Office of Nuclear Reactor Regulation
- S. A. Reynolds, Acting NRC Regional Administrator, Region IV
- J. M. Sebrosky, NRC Senior Project Manager
- L. E. Wilkins, NRC Project Manager
- J. C. Kirkland, NRC Senior Resident Inspector

## **Fort Calhoun Station, Unit No. 1**

### **First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation**

#### **1 Introduction**

The Omaha Public Power District (OPPD) has developed an overall integrated plan (Reference 1) for Fort Calhoun Station documenting the requirements to install reliable Spent Fuel Pool Level Instrumentation (SFPLI), in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the overall integrated plan (Reference 1) including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

#### **2 Milestone Accomplishments**

The following milestones have been completed since the development of the overall integrated plan (Reference 1), and are current as of August 16, 2013.

- Procured the Spent Fuel Pool Instrumentation on July 31, 2013.

#### **3 Milestone Schedule Status**

This section provides the activity status of each item, and the expected completion date noting any change. The Attachment contains an update to the Milestone Schedule to support the overall integrated plan (Reference 1). The dates are planning dates subject to change as design and implementation details are developed.

The Attachment is formatted to align with the table provided in the Nuclear Energy Institute's (NEI) Six-Month Status Report Template and supersedes the Milestone Schedule provided by Reference 1.

#### **4 Changes to Compliance Method**

There are no changes to the compliance method as documented in the overall integrated plan (Reference 1).

#### **5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

OPPD expects to comply with the order implementation date and no relief/relaxation is required at this time.

#### **6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

There are no open items to report at this point in time regarding the overall integrated plan or the Draft Safety Evaluation.

## **7 References**

The following references support the updates to the overall integrated plan described in this enclosure.

1. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "Fort Calhoun Station Spent Fuel Pool Instrumentation Overall Integrated Plan," dated February 28, 2013, (ML13059A268) (LIC-13-0011)
2. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ML12056A044) (NRC-12-0023)

Attachment: SFPLI Overall Integrated Implementation Plan Milestone Schedule, Revision 1

**Fort Calhoun Station EA-12-051 SFPLI Overall Integrated Implementation Plan**

**Milestone Schedule  
 Revision 1**

The following milestone schedule is provided. The dates are planning dates subject to change as design and implementation details are developed. Any changes to the following target dates will be reflected in subsequent 6-month status reports.

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Submit 60-Day Status Report	October 27, 2012	Complete	N/A
Submit Overall Integrated Plan	February 28, 2013	Complete	N/A
<b>Submit Six-Month Updates:</b>			
Update 1	August 28, 2013	Complete	N/A
Update 2	February 28, 2014	Not Started	N/A
Update 3	August 28, 2014	Not Started	N/A
Update 4	February 28, 2015	Not Started	N/A
<b>Modifications:</b>			
Conceptual Design	2Q2013	Started	N/A
Begin Detailed Design Engineering	3Q2013	Not Started	N/A
Procure SFPLI Equipment	3Q2013	Complete	N/A
Complete and Issue SFPLI Modification Package	2Q2015	Not Started	N/A
Receipt of Spent Fuel Pool (SFP) Instruments	3Q2015	Not Started	1Q2015
Begin Installation (includes Complete Functional Test of SFP Instruments)	1Q2016	Not Started	N/A

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Complete SFPLI Installation and Put Into Service (includes SFP Instrument Operational And Training complete)	2Q2016	Not Started	N/A